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14 CHURCH OF SCIENTOLOGY
15 INTERNATIONAL

16 SUPERIOR COURT OF THE STATE OF CALIFORNIA
17 FOR THE COUNTY OF MARIN

18 CHURCH OF SCIENTOLOGY)
19 INTERNATIONAL, a California not-)
20 for-profit religious corporation,)

21 Plaintiff,

22 vs.

23 GERALD ARMSTRONG; DOES 1 through)
24 25, inclusive,)

25 Defendants.)

26 CASE NO. 157 680

27 [CONSOLIDATED]

28 DECLARATION OF LAURIE J.)
BARTILSON IN SUPPORT OF)
PLAINTIFF'S MOTION FOR)
PROTECTIVE ORDER AND)
SANCTIONS)

DATE: March 9, 1995

TIME: 10:00 a.m.

DEPT: LAW AND MOTION

HEARING JUDGE: DISCOVERY

REFEREE

TRIAL DATE: May 18, 1995

RECEIVED

FEB 16 1995

HUB LAW OFFICES

1 LAURIE J. BARTILSON deposes and says:

2 1. My name is Laurie J. Bartilson and I am one of the
3 attorneys responsible for the representation of the plaintiff and
4 cross-defendant in this action. I have personal knowledge of the
5 facts set forth in this Declaration and could competently testify
6 thereto if called as a witness.

7 2. Attached hereto and incorporated herein are true and
8 correct copies of documents submitted as exhibits in support of
9 the Church of Scientology International's memorandum of points
10 and authorities in support of CSI's motion for protective order:

11 Exhibit A: Gerald Armstrong's Amended Specially Prepared
12 Interrogatories to Church of Scientology
13 International;

14 Exhibit B: Excerpts from the Deposition of Lynn R.
15 Farny, July 11, 1994, pages 34-37, 41-43;

16 Exhibit C: Verified Amended Cross-Complaint for
17 Declaratory Relief, Abuse of Process, and
18 Breach of Contract;

19 Exhibit D: Order Granting Summary Adjudication Dated
20 August 16, 1994;

21 Exhibit E: Letter from me to Ford Greene dated January
22 13, 1995.

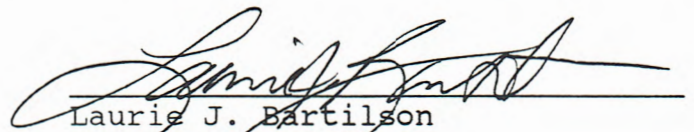
23 3. I received no response to my letter to Mr. Greene dated
24 January 13, 1995. My co-counsel, Mr. Wilson, contacted Mr.
25 Greene by telephone on or about February 9, 1995, and again asked
26 Mr. Greene to withdraw the interrogatories. Mr. Greene refused.
27 On February 13, 1995, Mr. Wilson again called Mr. Greene's
28 office, and spoke to Mr. Armstrong. He repeated his request that

1 Mr. Greene withdraw the interrogatories, and submit a more
2 reasonable number, and indicated that plaintiff would be forced
3 to move for protective order and seek sanctions if withdrawal did
4 not occur. Mr. Greene did not respond.

5 4. I have expended in excess of 4 hours preparing this
6 motion for protective order. In addition, I expect to spend
7 additional time traveling to Marin, preparing for and arguing
8 this motion. My normal billing rate is \$200 per hour, making the
9 cost of this motion to my client, in attorneys' fees alone,
10 \$1,000. In addition, I anticipate that my client will be billed
11 at least \$150 by the Referee for his time spent in connection
12 with this matter. I therefore request sanctions in the amount of
13 \$1,150.

14 I declare under the penalty of perjury under the laws
15 of the State of California that the foregoing is true and
16 correct.

17 Executed this 14th day of February, 1995, at Los Angeles,
18 California.

19 
20 Laurie J. Bartilson
21
22
23
24
25
26
27
28

1 Ford Greene
California State Bar No. 107601
2 HUB LAW OFFICES
711 Sir Francis Drake Boulevard
3 San Anselmo, California 94960-1949

4 Attorney for Defendant
GERALD ARMSTRONG

5
6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF MARIN
9

10 CHURCH OF SCIENTOLOGY INTERNATIONAL,)
11 a California not-for-profit)
religious corporation,)

12 Plaintiff,)

13 vs.)

14 GERALD ARMSTRONG; MICHAEL WALTON;)
15 THE GERALD ARMSTRONG CORPORATION,)
a California for-profit)
16 corporation; DOES 1 through 100,)
inclusive,)

17 Defendants.)
18)
19)

No. 157 680

GERALD ARMSTRONG'S
AMENDED SPECIALLY PREPARED
INTERROGATORIES TO
CHURCH OF SCIENTOLOGY
INTERNATIONAL

Trial Date: 5/18/95

20 Responding Party: Plaintiff CHURCH OF SCIENTOLOGY INTERNATIONAL

21 Propounding Party: Defendant GERALD ARMSTRONG

22 Set No: ONE

23
24 1. WHEN was DA DOC A (as used in these special
25 interrogatories, DA DOC A refers to the DOCUMENT entitled "Gerald
26 Armstrong" produced by plaintiff/cross-defendant in response to
27 defendant/cross-complainant's first inspection demand and Bates
28 stamped in said production (hereinafter "PLAINTIFF'S PRODUCTION"))

1 with numbers 200048 through 200188) prepared? In these
2 interrogatories, WHEN, when referring to a time some action
3 occurred, means state the day, month and year of such action
4 occurring as accurately as possible in accordance with the
5 Gregorian calendar.

6 2. WHERE was DA DOC A prepared? In these interrogatories,
7 WHERE, when referring to a location at which an occurrence
8 occurred, or a location at which a thing is placed or stored,
9 means state the street address, city, state or province, and
10 country if different from the United States; office or room name
11 and number or descriptive function; or, if such location is not in
12 a building, provide a concise description identifiable on a
13 commonly available English language map.

14 3. WHERE is the master or original of DA DOC A located?

15 4. IDENTIFY each person who participated in any way in the
16 preparation of DA DOC A. In these interrogatories, IDENTIFY, when
17 referring to a person, means state the person's full name,
18 address, telephone number, job or post title at the time
19 considered by the interrogatory, and job or post title in present
20 time.

21 5. IDENTIFY each sum of money each person who participated
22 in any way in the preparation of DA DOC A was paid at any time for
23 his or her participation in said preparation. (Pro rate as
24 reasonable.) In these interrogatories, IDENTIFY, when referring to
25 a sum of money for costs, expenditures, pay or any other purpose,
26 means state the date of the disbursement of such sum, to whom such
27 sum was disbursed, the form of the disbursement, and the amount of
28

28

1 the sum in United States dollars.

2 6. DESCRIBE what each of the persons IDENTIFIED in your
3 answer to 4 above did in preparing DA DOC A. In these
4 interrogatories, DESCRIBE, when referring to actions taken by any
5 person in the preparation of a DOCUMENT, means state in plain
6 English what part of all actions taken by all persons who
7 participated in all actions taken was taken by each said
8 IDENTIFIED person.

9 7. IDENTIFY who was in charge of the preparation of DA DOC
10 A.

11 8. IDENTIFY who ordered the preparation of DA DOC A.

12 9. IDENTIFY each person who approved the preparation of DA
13 DOC A.

14 10. WHEN did the person or persons IDENTIFIED in your answer
15 to 8 above order the preparation of DA DOC A?

16 11. IDENTIFY the ORDER or COMMUNICATION to prepare DA DOC A.
17 In these interrogatories, IDENTIFY, when referring to an ORDER or
18 other COMMUNICATION of any kind means state its date of
19 origination, whether it was verbal, written or in any other form;
20 the medium on which it travelled; its originator, the originator's
21 post or job title, the ORDER or COMMUNICATION'S intended
22 recipient, indicated relay or approval terminals or persons,
23 indicated copy recipients, and all actual recipients; the title,
24 and text or substance of said ORDER or COMMUNICATION; the present
25 location of known copies; and, the present location of its
26 original.

27 12. IDENTIFY each person, company, group, organization or
28

1 other entity to whom DA DOC A has been disseminated by anyone at
2 any time. In these interrogatories, IDENTIFY, when referring to a
3 company, group, organization or other entity, means state the
4 company's, group's, organization's or other entity's name or
5 title, address and telephone number.

6 13. WHEN was DA DOC A disseminated to each of the persons,
7 companies, groups, organizations or other entities IDENTIFIED in
8 your answer to 12 above?

9 14. IDENTIFY each person who disseminated DA DOC A to each
10 of the persons, companies, groups, organizations or other
11 entities, IDENTIFIED in your answer to 12 above.

12 15. IDENTIFY each person who ORDERED the dissemination of DA
13 DOC A to each of the persons, companies, groups, organizations or
14 other entities IDENTIFIED in your answer to 12 above.

15 16. IDENTIFY each administration or management policy of
16 Scientology which was followed by each person who carried out the
17 preparation and dissemination of DA DOC A in the course of
18 carrying out such preparation and dissemination. In these
19 interrogatories, IDENTIFY, when referring to administration or
20 management policies of Scientology, means state the issue type,
21 title and date of the relevant Hubbard Communications Office
22 Policy Letter, Office of Special Affairs Executive Directive,
23 Religious Technology Executive Directive, Sea Organization
24 Directive, Flag Order, Executive Directive, Directive, or other
25 Scientology issue type, and the LOCATION of the original or master
26 of such policy.

27 17. IDENTIFY all financial costs in the preparation and
28

1 distribution of DA DOC A. In these interrogatories, IDENTIFY,
2 when referring to costs or expenditures of any kind, means state
3 for each cost or expenditure WHEN such cost or expenditure was
4 incurred or made, what product or service such cost or expenditure
5 represents, the supplier of such product or service, and the
6 amount of such cost or expenditure in US dollars.

7 18. IDENTIFY each sum of money that each person who
8 participated in any way in the dissemination of DA DOC A was paid
9 at any time for his or her participation in said dissemination.
10 (Pro rate as reasonable.)

11 19. IDENTIFY all DOCUMENTS, other than those included within
12 DA DOC A, which support any of the claims made in Bates stamped
13 pages 200048 through 200056 of DA DOC A. In these
14 interrogatories, IDENTIFY, when referring to a DOCUMENT of any
15 kind, means state whether it is printed, electronic or of another
16 DOCUMENT type; its DATE of creation, title, originator, intended
17 recipients, indicated relay or approval terminals or persons,
18 indicated copy recipients, and actual recipients; its text or
19 substance; the location of all known copies; and, the location of
20 its original.

21 20. IDENTIFY who wrote SENTENCE 1 (SENTENCE 1 refers to the
22 sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
23 200048 which states "In breach of this obligation, Armstrong
24 loaned the documents to one Omar Garrison, an author who at one
25 time had been retained to write a biography of Mr. Hubbard, a
26 project which fell through.")

27 21. IDENTIFY each of the "documents" referred to in SENTENCE
28

1 1.

2 22. Was Garrison retained to write a biography of Hubbard at
3 the time Armstrong delivered to him the documents referred to in
4 SENTENCE 1?

5 23. Was Garrison under contract to write a biography of
6 Hubbard referred to in SENTENCE 1?

7 24. If your answer to 23 is "Yes," IDENTIFY the parties to
8 said contract? In these interrogatories, IDENTIFY, when referring
9 to a party, means state the party's full name, address and
10 telephone number.

11 25. If your answer to 23 is "Yes," and said contract was
12 terminated, IDENTIFY what writing, instrument or DOCUMENT
13 terminated said contract.

14 26. If said contract was terminated by any writing,
15 instrument or DOCUMENT WHEN did each of the parties thereto sign
16 such terminating writing, instrument or DOCUMENT?

17 27. If your answer to 23 is "Yes," was there any provision
18 in said contract for the providing of biographical materials
19 concerning Hubbard to Garrison?

20 28. If your answer to 27 is "yes," state the precise
21 language of such provision.

22 29. If your answer to 27 is "yes," did such provision
23 authorize Armstrong to deliver Hubbard biographical materials to
24 Garrison?

25 30. If your answer to 23 is "Yes," WHERE is the present
26 location of any originals of said contract.

27 31. If your answer to 23 is "Yes," WHERE is the present
28

1 location of any known copies of said contract.

2 32. IDENTIFY who wrote SENTENCE 2 (SENTENCE 2 refers to the
3 sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
4 200048 which states "Armstrong gave these documents to Garrison
5 not to assist him in writing the biography but to enable Garrison
6 to deliver them to attorneys representing litigants involved in
7 suits against the Church.")

8 33. State each fact on which you base the allegations in
9 SENTENCE 2.

10 34. IDENTIFY each DOCUMENT which supports the allegations in
11 SENTENCE 2.

12 35. IDENTIFY who wrote SENTENCE 3 (SENTENCE 3 refers to the
13 sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
14 200048 which states "The Court did not permit the Church to
15 present any of its own witnesses to rebut the testimony of hostile
16 witnesses about Armstrong's alleged "state of mind."")

17 36. IDENTIFY each of the "witnesses" (persons) referred to
18 in SENTENCE 3 which, "the Court did not permit the Church to
19 present."

20 37. IDENTIFY each place in the record of the trial referred
21 to in SENTENCE 3 whereat the Court "did not permit the Church to
22 present" each of the "witnesses" IDENTIFIED in your answer to 36
23 above. In these interrogatories, IDENTIFY, when referring to a
24 place in a DOCUMENT or record, means state the date, page and line
25 number.

26 38. IDENTIFY each of the witnesses (persons) the Court did
27 permit the Church to present during the trial referred to in
28

1 SENTENCE 3.

2 39. State what each of the "witnesses" IDENTIFIED in your
3 answer to 36 above would have testified to regarding "Armstrong's
4 alleged "state of mind"" had he or she been "permitted" by the
5 Court to so testify in the trial referred to in SENTENCE 3.

6 40. IDENTIFY who wrote SENTENCE 4 (SENTENCE 4 refers to the
7 sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
8 200049 which states "Since the case was heard, Armstrong has
9 adopted a degraded life-style and developed some odd financial
10 ideas.")

11 41. WHEN did the person IDENTIFIED in your answer to 40
12 above write SENTENCE 4?

13 42. State each fact on which you base the allegations in
14 SENTENCE 4.

15 43. IDENTIFY each DOCUMENT which supports the allegations in
16 SENTENCE 4.

17 44. DESCRIBE what about Armstrong's life-style at the time
18 of the preparation of DA DOC A rendered it a "degraded life-
19 style," as stated in SENTENCE 4. In these interrogatories,
20 DESCRIBE, when referring to a "life-style," means state in plain
21 English by comparing the details of such a "life-style," including
22 but not limited to the surroundings and activities, with a
23 "normal" or "usual" or "commonplace" lifestyle, as "normal,
24 "usual" and "commonplace" are normally understood.

25 45. DESCRIBE in as much detail as possible Armstrong's life-
26 style referred to in SENTENCE 4, including but not limited to
27 Armstrong's surroundings and activities.

28

1 46. DESCRIBE what about Armstrong's life-style, including
2 but not limited to Armstrong's surroundings and activities, at
3 present time renders it a "degraded life-style," as stated in
4 SENTENCE 4.

5 47. DESCRIBE what about Armstrong's financial ideas referred
6 to in SENTENCE 4 makes such ideas odd? In these interrogatories,
7 DESCRIBE, when referring to a "financial idea," means state in
8 plain English by comparing the details of such a "financial idea"
9 with a "normal" or "usual" or "commonplace" financial idea, as
10 "normal, "usual" and "commonplace" are normally understood.

11 48. IDENTIFY Armstrong's financial ideas referred to in
12 SENTENCE 4. IDENTIFY, when used in this interrogatory, means state
13 in plain English as concise, separate concepts understandable to
14 economists and other financial professionals.

15 49. DESCRIBE what Armstrong did to "develop" each of the
16 financial ideas referred to in SENTENCE 4. In these
17 interrogatories, DESCRIBE, when referring to the developing of a
18 "financial idea," means state in plain English each step or stage
19 in such development, tests that were made, and the results of all
20 such tests.

21 50. IDENTIFY who wrote SENTENCE 5 (SENTENCE 5 refers to the
22 sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
23 200049 which states "Today Armstrong is hooked up with Cult
24 Awareness Network (CAN), which is primarily a referral agency for
25 those who engage in the illegal activity of kidnapping adults for
26 the purpose of forcibly persuading them to abandon their religious
27 beliefs.")

28

1 51. State each fact on which you base the allegations in
2 SENTENCE 5.

3 52. IDENTIFY each DOCUMENT which supports the allegations in
4 SENTENCE 5.

5 53. DESCRIBE the form by which Armstrong is allegedly
6 "hooked up with" CAN as stated in SENTENCE 5. In this
7 interrogatory, DESCRIBE means IDENTIFY each connection hooking up
8 Armstrong with CAN and state in plain English for each such
9 connection WHEN it commenced and all facts on which you base its
10 continued existence.

11 54. IDENTIFY each of the times from 1986 to the present WHEN
12 CAN referred anyone to anyone else engaged in "kidnapping adults
13 for the purpose of forcibly persuading them to abandon their
14 religious beliefs," as stated in SENTENCE 5. In these
15 interrogatories, IDENTIFY, when referring to a time, means state
16 the day, month and year as accurately as possible in accordance
17 with the Gregorian calendar.

18 55. For each of the times IDENTIFIED in your answer to 54
19 above, IDENTIFY the person or persons CAN referred to anyone
20 engaged in "kidnapping adults for the purpose of forcibly
21 persuading them to abandon their religious beliefs," as stated in
22 SENTENCE 5.

23 56. For each of the times IDENTIFIED in your answer to 54
24 above, IDENTIFY the person or persons allegedly engaged in
25 "kidnapping adults for the purpose of forcibly persuading them to
26 abandon their religious beliefs," as stated in SENTENCE 5, to whom
27 CAN referred the persons IDENTIFIED in your answer to 55 above.*

28

1 57. IDENTIFY each person who was kidnapped as the result of
2 a referral from CAN from 1986 to the present.

3 58. IDENTIFY each sum of money paid to CAN for each referral
4 for each kidnapped person IDENTIFIED in your answer to 57 above.

5 59. IDENTIFY who wrote SENTENCE 6 (SENTENCE 6 refers to the
6 sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
7 200049 which states "He has the ear of Priscilla Coates and
8 appears to be on excellent terms with CAN's leadership.")

9 60. State each fact on which you base the allegations in
10 SENTENCE 6.

11 61. IDENTIFY each DOCUMENT which supports the allegations in
12 SENTENCE 6.

13 62. DESCRIBE the form by which Armstrong allegedly "has the
14 ear of Priscilla Coates." In this interrogatory, DESCRIBE, means
15 state in plain English by what means Armstrong possesses Priscilla
16 Coates' ear, by what means he maintains possession of said ear,
17 and where you believe he keeps such possessed ear.

18 63. IDENTIFY who wrote SENTENCE 7 (SENTENCE 7 refers to the
19 sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
20 200050 which states "This evidence shows conclusively that
21 Armstrong's "justification" defense was a sham and a fraud.")

22 64. State each fact on which you base the allegations in
23 SENTENCE 7.

24 65. IDENTIFY each DOCUMENT which supports the allegations in
25 SENTENCE 7.

26 66. What PERIOD OF TIME is encompassed or considered in
27 Armstrong's "justification" defense," referred to in SENTENCE 7?
28

1 In these interrogatories, PERIOD OF TIME, means state as
2 accurately as possible, in accordance with the Gregorian calendar,
3 the day, month and year an occurrence or event began and the day,
4 month and year an occurrence or event ended.

5 67. WHEN were any alleged torts committed by Armstrong, for
6 which he was exonerated by the "justification" defense" referred
7 to in SENTENCE 7?

8 68. If Armstrong's alleged "justification" defense"
9 referred to in SENTENCE 7 had not been a "fraud and a sham," as
10 also referred to in SENTENCE 7, in what way or manner would it
11 have differed from the defense Armstrong in fact presented?

12 69. IDENTIFY who wrote SENTENCE 8 (SENTENCE 8 refers to the
13 sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
14 200050 which states "He (Armstrong) was not remotely in fear of
15 retaliation by the Church and was actively plotting the Church's
16 downfall.")

17 70. State each fact on which you base the allegations in
18 SENTENCE 8.

19 71. IDENTIFY each DOCUMENT which supports the allegations in
20 SENTENCE 8.

21 72. What PERIOD OF TIME is encompassed or considered in the
22 allegation in SENTENCE 8 that Armstrong "was not remotely in fear
23 of retaliation?"

24 73. What PERIOD OF TIME is encompassed or considered in the
25 allegation in SENTENCE 8 that Armstrong "was actively plotting the
26 Church's downfall?"

27 74. IDENTIFY who wrote SENTENCE 9 (SENTENCE 9 refers to the
28

1 sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
2 200050 which states "As part of his plan, Armstrong actively
3 sought out Church members who would be willing to "defect" and
4 assist him in discrediting Church leadership.")

5 75. State each fact on which you base the allegations in
6 SENTENCE 9.

7 76. IDENTIFY each DOCUMENT which supports the allegations in
8 SENTENCE 9.

9 77. What PERIOD OF TIME is encompassed or considered in the
10 allegation that Armstrong "actively sought out Church members who
11 would be willing to "defect"," as stated in SENTENCE 9.

12 78. DESCRIBE what actions Armstrong took when he allegedly
13 "actively sought out Church members who would be willing to
14 "defect"," as stated in SENTENCE 9. In these interrogatories,
15 DESCRIBE, when referring to an action taken by anyone, means state
16 WHEN such action occurred, WHERE such action occurred, and in
17 plain English the form of the action from its commencement to its
18 completion.

19 79. DESCRIBE what actions Armstrong took to get others to
20 allegedly "assist him in discrediting Church leadership," as
21 stated in SENTENCE 9.

22 80. IDENTIFY each person in "Church leadership" at the time
23 considered by SENTENCE 9.

24 81. IDENTIFY each person in "Church leadership" at this
25 time.

26 82. IDENTIFY who wrote SENTENCE 10 (SENTENCE 10 refers to
27 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
28

1 200050 which states "After leaving the Church, he contacted Church
2 member Daniel Sherman, to enlist Sherman's aid in attacking the
3 Church.")

4 83. State each fact on which you base the allegations in
5 SENTENCE 10.

6 84. IDENTIFY each DOCUMENT which supports the allegations in
7 SENTENCE 10.

8 85. WHEN did Armstrong first contact Sherman to allegedly
9 "enlist Sherman's aid in attacking the Church," as stated in
10 SENTENCE 10?

11 86. WHERE did Armstrong first contact Sherman to allegedly
12 "enlist Sherman's aid in attacking the Church," as stated in
13 SENTENCE 10?

14 87. DESCRIBE what Armstrong did and/or said during his first
15 contact with Sherman to allegedly "enlist Sherman's aid in
16 attacking the Church," as stated in SENTENCE 10.

17 88. Subsequent to the time IDENTIFIED in your answer to 84
18 above, WHEN was each alleged contact Armstrong had with Sherman to
19 allegedly "enlist Sherman's aid in attacking the Church," as
20 stated in SENTENCE 10?

21 89. WHERE did each of the alleged contacts Armstrong had
22 with Sherman to allegedly "enlist Sherman's aid in attacking the
23 Church," as stated in SENTENCE 10, occur?

24 90. DESCRIBE what Armstrong did and/or said during each
25 contact with Sherman to allegedly "enlist Sherman's aid in
26 attacking the Church," as stated in SENTENCE 10.

27 91. DESCRIBE what Sherman did and/or said during each
28

1 contact with Armstrong IDENTIFIED in your answers to 85 and 88
2 above.

3 92. IDENTIFY who wrote SENTENCE 11 (SENTENCE 11 refers to
4 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
5 200050 which states "Sherman, without Armstrong's knowledge,
6 consulted Church staff for advice.")

7 93. State each fact on which you base the allegations in
8 SENTENCE 11.

9 94. IDENTIFY each DOCUMENT which supports the allegations in
10 SENTENCE 11.

11 95. WHEN did Sherman first consult "Church staff for advice"
12 concerning Armstrong, as stated in SENTENCE 11?

13 96. WHERE did Sherman first consult "Church staff for
14 advice" concerning Armstrong, as stated in SENTENCE 11?

15 97. IDENTIFY who on "Church staff" Sherman first consulted
16 "for advice" concerning Armstrong, as stated in SENTENCE 11?

17 98. IDENTIFY who ORDERED and/or authorized any individual on
18 "Church staff" to communicate at any time with Sherman concerning
19 Armstrong.

20 99. What did Sherman state during his first consultation
21 with "Church staff" concerning Armstrong?

22 100. What was stated to Sherman by any "Church staff" during
23 his first consultation with such "Church staff" concerning
24 Armstrong?

25 101. What was Sherman ORDERED and/or told to do concerning
26 Armstrong by any "Church staff" during or after his first
27 consultation with such "Church staff" concerning Armstrong?
28

1 102. Subsequent to the time IDENTIFIED in your answer to 95
2 above, WHEN was each subsequent time Sherman consulted "Church
3 staff for advice" concerning Armstrong, as stated in SENTENCE 11?

4 103. WHERE did each subsequent time IDENTIFIED in your answer
5 to 102 above take place?

6 104. During each of the subsequent times IDENTIFIED in your
7 answer to 102 above what did Sherman state to any "Church staff"
8 concerning Armstrong?

9 105. During each of the subsequent times IDENTIFIED in your
10 answer to 102 above what did any "Church staff" state to Sherman
11 concerning Armstrong?

12 106. What was Sherman ORDERED or told to do concerning
13 Armstrong by any "Church staff" during or after each consultation
14 with them concerning Armstrong IDENTIFIED in your answer to 102
15 above?

16 107. Was Sherman ever told by anyone on "Church staff" at any
17 time to lie to Armstrong about anything?

18 108. If your answer to the preceding question is "yes,"
19 IDENTIFY each person on "Church staff" who at any time told
20 Sherman to lie to Armstrong about anything.

21 109. For each person IDENTIFIED in your answer to 108 above
22 state WHEN each such person told Sherman to lie to Armstrong about
23 anything.

24 110. For each person IDENTIFIED in your answer to 108 above,
25 IDENTIFY WHERE each such person told Sherman to lie to Armstrong
26 about anything.

27 111. For each person IDENTIFIED in your answer to 108 state
28

1 truthfully what lies he or she told Sherman to tell Armstrong.

2 112. For each lie IDENTIFIED in your answer to 111 above,
3 state what was the TRUTH UNDERLYING IT. In this interrogatory,
4 the TRUTH UNDERLYING IT means what would an honest person speaking
5 honestly say in place of the lie Sherman was told to tell.

6 113. For each lie IDENTIFIED in your answer to 111 above,
7 state what was the purpose in having Sherman tell Armstrong such
8 lie.

9 114. Was Sherman at any time shown and/or given any DOCUMENT
10 mentioning, concerning or relating in any way to Armstrong by
11 anyone on or connected to "Church staff" referred to in SENTENCE
12 11?

13 115. If your answer to 114 above was "yes," WHEN was each
14 occasion Sherman was shown and/or given any DOCUMENT mentioning,
15 concerning or relating in any way to Armstrong by anyone on or
16 connected to "Church staff" referred to in SENTENCE 11?

17 116. For each time IDENTIFIED in your answer to 115 above,
18 IDENTIFY each DOCUMENT shown and/or given to Sherman.

19 117. For each DOCUMENT IDENTIFIED in your answer to 116
20 above, IDENTIFY each person or persons who showed and/or gave such
21 DOCUMENT to Sherman.

22 118. For each DOCUMENT IDENTIFIED in your answer to 116
23 above, IDENTIFY who ORDERED that such DOCUMENT be shown and/or
24 given to Sherman.

25 119. For each person IDENTIFIED in your answer to 118 above,
26 IDENTIFY WHEN such person ORDERED that the DOCUMENTs IDENTIFIED in
27 your answer to 116 above be shown and/or given to Sherman.

28

1 120. For each DOCUMENT IDENTIFIED in your answer to 116
2 above, IDENTIFY WHERE the original and any copies are located.

3 121. IDENTIFY who wrote SENTENCE 12 (SENTENCE 12 refers to
4 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
5 200050 which states "It was decided that the Church would obtain
6 authorization from the Los Angeles Police Department to make
7 "undercover" videotapes of Armstrong's conversations with Sherman
8 and any other Church dissidents or defectors.")

9 122. State each fact on which you base the allegations in
10 SENTENCE 12.

11 123. IDENTIFY each DOCUMENT which supports the allegations in
12 SENTENCE 12.

13 124. WHEN was the decision referred to in SENTENCE 12 made?

14 125. WHERE was the decision referred to in SENTENCE 12 made?

15 126. IDENTIFY who made the decision referred to in SENTENCE
16 12.

17 127. IDENTIFY each person who ORDERED and/or authorized the
18 decision referred to in SENTENCE 12 and/or said decision's
19 execution.

20 128. IDENTIFY each person who participated in making the
21 decision referred to in SENTENCE 12.

22 129. IDENTIFY each fact or DOCUMENT of any kind considered by
23 each of the participants in the decision-making process in
24 arriving at the decision referred to in SENTENCE 12. IDENTIFY in
25 this interrogatory means state the facts as concise separate
26 concepts, and state each IDENTIFIED DOCUMENT'S type, date of
27 creation, title, originator, intended recipients, indicated relay
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1 or approval terminals or persons and indicated copy recipients;
2 its text or substance; the location of known copies; and, the
3 location of its original.

4 130. WHEN was the first contact made by anyone connected to
5 the "Church" with the Los Angeles Police Department to obtain the
6 "authorization" referred to in SENTENCE 12?

7 131. WHERE was the first contact made by anyone connected to
8 the "Church" with the Los Angeles Police Department to obtain the
9 "authorization" referred to in SENTENCE 12?

10 132. IDENTIFY what person or persons connected to the
11 "Church" made the first contact with the Los Angeles Police
12 Department to obtain the "authorization" referred to in SENTENCE
13 12.

14 133. IDENTIFY each DOCUMENT of any kind given by anyone
15 connected to the "Church" to anyone in the Los Angeles Police
16 Department at the time of the first contact with the Los Angeles
17 Police Department to obtain the "authorization" referred to in
18 SENTENCE 12.

19 134. IDENTIFY each member of the Los Angeles Police
20 Department who was communicated with by anyone connected to the
21 "Church" at the time of the first contact with the Los Angeles
22 Police Department to obtain the "authorization" referred to in
23 SENTENCE 12.

24 135. IDENTIFY each DOCUMENT of any kind given by any member
25 of the Los Angeles Police Department to anyone connected to the
26 "Church" at the time of the first contact with the Los Angeles
27 Police Department to obtain the "authorization" referred to in
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1 SENTENCE 12.

2 136. State what was said by anyone connected to the "Church"
3 to each member of the Los Angeles Police Department who was
4 communicated with by anyone connected to the "Church" at the time
5 of the first contact with the Los Angeles Police Department to
6 obtain the "authorization" referred to in SENTENCE 12.

7 137. State what was said by each member of the Los Angeles
8 Police Department who was communicated with by anyone connected to
9 the "Church" to anyone connected to the "Church" at the time of
10 the first contact with the Los Angeles Police Department to obtain
11 the "authorization" referred to in SENTENCE 12.

12 138. After the time IDENTIFIED in your answer to 130 above
13 WHEN was each subsequent contact made by anyone connected to the
14 "Church" with the Los Angeles Police Department to obtain the
15 "authorization" referred to in SENTENCE 12?

16 139. Where was each subsequent contact IDENTIFIED in your
17 answer to 138 above made by anyone connected to the "Church" with
18 the Los Angeles Police Department to obtain the "authorization"
19 referred to in SENTENCE 12?

20 140. IDENTIFY each person or persons connected to the
21 "Church" who made each of the subsequent contacts IDENTIFIED in
22 your answer to 138 above with the Los Angeles Police Department to
23 obtain the "authorization" referred to in SENTENCE 12.

24 141. IDENTIFY each DOCUMENT of any kind given by anyone
25 connected to the "Church" to anyone in the Los Angeles Police
26 Department at the time of or following each of the contacts
27 IDENTIFIED in your answer to 138 above.

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1 142. IDENTIFY each member of the Los Angeles Police
2 Department who was communicated with by anyone connected to the
3 "Church" at the time of each of the contacts IDENTIFIED in your
4 answer to 138 above.

5 143. IDENTIFY each DOCUMENT of any kind given by any member
6 of the Los Angeles Police Department to anyone connected to the
7 "Church" at the time of or following each of the contacts
8 IDENTIFIED in your answer to 138 above.

9 144. State what was said by anyone connected to the "Church"
10 to each member of the Los Angeles Police Department who was
11 communicated with by anyone connected to the "Church" at the time
12 of each of the contacts IDENTIFIED in your answer to 138 above.

13 145. State what was said by each member of the Los Angeles
14 Police Department who was communicated with by anyone connected to
15 the "Church" to anyone connected to the "Church" at the time of
16 each of the contacts IDENTIFIED in your answer to 138 above.

17 146. Were any videotapes referred to in SENTENCE 12 made of
18 any conversations between Armstrong and Sherman?

19 147. If any videotapes were made of any conversations between
20 Armstrong and Sherman, WHEN were they made?

21 148. If any videotapes were made of any conversations between
22 Armstrong and Sherman, WHERE were they made?

23 149. If any videotapes were made of any conversations between
24 Armstrong and Sherman, what person or entity now possesses such
25 videotapes?

26 150. IDENTIFY each of the "other Church dissidents or
27 defectors" referred to in SENTENCE 12.

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1 151. Were any videotapes referred to in SENTENCE 12 made of
2 any of the "other Church dissidents or defectors" IDENTIFIED in
3 your answer to 150 above?

4 152. If any videotapes were made of any of the "other Church
5 dissidents or defectors" IDENTIFIED in your answer to 150 above,
6 WHEN were such videotapes made?

7 153. If any videotapes were made of any of the "other Church
8 dissidents or defectors" IDENTIFIED in your answer to 150 above,
9 WHERE were such videotapes made?

10 154. If any videotapes were made of any of the "other Church
11 dissidents or defectors" IDENTIFIED in your answer to 150 above,
12 WHERE are all known copies of such videotapes located?

13 155. Were any audiotapes made at any time of any
14 conversations between Armstrong and Sherman?

15 156. If any audiotapes were made of any conversations between
16 Armstrong and Sherman, WHEN was each such audiotape made?

17 157. If any audiotapes were made of any conversations between
18 Armstrong and Sherman, WHERE were such audiotapes made?

19 158. If any audiotapes were made of any conversations between
20 Armstrong and Sherman, WHERE are all known copies of such
21 audiotapes located?

22 159. Were any audiotapes made at any time of any
23 conversations of any of the "other Church dissidents or defectors"
24 IDENTIFIED in your answer to 150 above?

25 160. If any audiotapes were made of any of the "other Church
26 dissidents or defectors" IDENTIFIED in your answer to 150 above,
27 WHEN were such audiotapes made?

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1 161. If any audiotapes were made of any of the "other Church
2 dissidents or defectors," IDENTIFIED in your answer to 150 above,
3 WHERE were such audiotapes made?

4 162. If any audiotapes were made of any of the "other Church
5 dissidents or defectors," IDENTIFIED in your answer to 150 above,
6 WHERE are all known copies of such audiotapes located?

7 163. IDENTIFY all financial expenditures and/or costs in
8 connection with any contact by anyone connected to "the Church"
9 with anyone connected to the Los Angeles Police Department
10 relating in any way to obtaining the "authorization" referred to
11 in SENTENCE 12.

12 164. IDENTIFY all financial expenditures and/or costs in
13 connection with any contact by anyone connected to "the Church"
14 with anyone connected to the Los Angeles Police Department
15 relating in any way to Armstrong.

16 165. IDENTIFY each sum of money in wages, fees or
17 reimbursement paid to anyone connected to "the Church" for
18 anything done in connection with any contact with anyone connected
19 to the Los Angeles Police Department relating in any way to
20 obtaining the "authorization" referred to in SENTENCE 12.

21 166. IDENTIFY each sum of money in wages, fees or
22 reimbursement paid to anyone connected to "the Church" for
23 anything done in connection with any contact with anyone connected
24 to the Los Angeles Police Department relating in any way to
25 Armstrong.

26 167. IDENTIFY each sum of money in wages, fees, bribes or
27 reimbursement paid to anyone connected to the Los Angeles Police
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1 Department by anyone connected to "the Church" for anything done
2 in connection with obtaining or giving the "authorization"
3 referred to in SENTENCE 12.

4 168. IDENTIFY each sum of money in wages, fees, bribes or
5 reimbursement paid to anyone connected to the Los Angeles Police
6 Department by anyone connected to "the Church" for anything done
7 relating in any way to Armstrong.

8 169. IDENTIFY the location of the records which reflect the
9 financial expenditures and/or costs IDENTIFIED in your answers to
10 163, 164, 165, 166, 167 and 168 above. In these interrogatories,
11 IDENTIFY, when referring to a location for records, means state
12 the street address, office or room name or descriptive function,
13 and Scientology unit, department, bureau or division and
14 organization responsible for the records in question.

15 170. IDENTIFY who wrote SENTENCE 13 (SENTENCE 13 refers to
16 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
17 200050 which states "The police authorized the investigation and
18 videotapes, at which point Sherman embarked on an effort to
19 ascertain the full extent of Armstrong's intentions.")

20 171. State each fact on which you base the allegations in
21 SENTENCE 13.

22 172. IDENTIFY each DOCUMENT which supports the allegations in
23 SENTENCE 13.

24 173. IDENTIFY what person or persons in the "police"
25 "authorized the investigation and videotapes," as stated in
26 SENTENCE 13?

27 174. WHEN did the first alleged authorization of the
28

1 "investigation and videotapes" referred to in SENTENCE 13 occur?

2 175. WHERE did the first alleged authorization of the

3 "investigation and videotapes" referred to in SENTENCE 13 occur?

4 176. DESCRIBE the form of the first alleged authorization of
5 the "investigation and videotapes."

6 177. WHEN did each subsequent alleged authorization of the
7 "investigation and videotapes" occur?

8 178. WHERE did each subsequent alleged authorization of the
9 "investigation and videotapes" occur?

10 179. DESCRIBE the form of each subsequent alleged
11 authorization of the "investigation and videotapes."

12 180. IDENTIFY each person connected to the "Church" who was
13 given the first alleged authorization of the "investigation and
14 videotapes."

15 181. IDENTIFY each person connected to the "police" referred
16 to in SENTENCE 13 who dealt with each of the persons IDENTIFIED in
17 your answer to 180 above.

18 182. IDENTIFY each person connected to the "Church" who was
19 given each of the subsequent alleged authorizations of the
20 "investigation and videotapes."

21 183. IDENTIFY each DOCUMENT given to any member of the
22 "police" referred to in SENTENCE 13 at any time by anyone
23 connected to the "Church" for any reason relating in any way to
24 obtaining any alleged authorization of the "investigation and
25 videotapes."

26 184. WHEN was each of the DOCUMENTS IDENTIFIED in your answer
27 to 183 above given?

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1 185. WHERE was each of the DOCUMENTS IDENTIFIED in your
2 answer to 183 above given to any member of the "police?"

3 186. IDENTIFY each person connected to the "police" referred
4 to in SENTENCE 13 who received each of the DOCUMENTS IDENTIFIED in
5 your answer to 183 above.

6 187. IDENTIFY each person connected to the "church" who gave
7 the "police" referred to in SENTENCE 13 each of the DOCUMENTS
8 IDENTIFIED in your answer to 183 above.

9 188. IDENTIFY each DOCUMENT obtained from any member of the
10 "police" referred to in SENTENCE 13 at any time by anyone
11 connected to the "Church" which allegedly "authorized the
12 investigation and videotapes."

13 189. IDENTIFY any other DOCUMENTS obtained from any member of
14 the Los Angeles Police Department at any time which mention,
15 concern or relate in any way to the obtaining or giving of any
16 authorization of the "investigation and videotapes."

17 190. IDENTIFY any other DOCUMENTS obtained from any member of
18 the Los Angeles Police Department at any time which mention,
19 concern or relate in any way to Gerald Armstrong.

20 191. WHEN was each of the DOCUMENTS IDENTIFIED in your
21 answers to 188, 189 and 190 above obtained?

22 192. WHERE was each of the DOCUMENTS IDENTIFIED in your
23 answers to 188, 189 and 190 above obtained?

24 193. State what was said to any member of the "police"
25 referred to in SENTENCE 13 at any time by anyone connected to the
26 "Church" for the purpose of or in the course of obtaining any
27 alleged authorization of the "investigation and videotapes."

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1 194. State what was said by any member of the "police"
2 referred to in SENTENCE 13 at any time to anyone connected to the
3 "Church" concerning or relating in any way to the obtaining or
4 giving of any alleged authorization of the "investigation and
5 videotapes."

6 195. State what was said by any member of the "police"
7 referred to in SENTENCE 13 at any time to anyone connected to the
8 "Church" concerning or relating in any way to Gerald Armstrong.

9 196. IDENTIFY who first conveyed the fact of the alleged
10 "police" authorization of the "investigation and videotapes" to
11 Sherman.

12 197. DESCRIBE the form of the conveyance of the fact of the
13 alleged "police" authorization of the "investigation and
14 videotapes" to Sherman.

15 198. WHEN was the fact of the alleged "police" authorization
16 of the "investigation and videotapes" first conveyed to Sherman?

17 199. WHERE was the fact of the alleged "police" authorization
18 of the "investigation and videotapes" first conveyed to Sherman?

19 200. IDENTIFY each time subsequent to the time IDENTIFIED in
20 your answer to 198 above WHEN the fact of the alleged "police"
21 authorization of the "investigation and videotapes" was conveyed
22 to Sherman?

23 201. For each time IDENTIFIED in your answer to the preceding
24 question, IDENTIFY who conveyed each fact of the alleged "police"
25 authorization of the "investigation and videotapes" to Sherman.

26 202. DESCRIBE the form of each conveyance to Sherman of the
27 subsequent facts of alleged authorizations of the "investigation
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1 and videotapes."

2 203. State WHEN each of the subsequent facts of alleged
3 authorizations of the "investigation and videotapes" was conveyed
4 to Sherman.

5 204. State WHERE each of the subsequent facts of alleged
6 authorizations of the "investigation and videotapes" was conveyed
7 to Sherman.

8 205. WHEN did "Sherman embark" "on an effort to ascertain the
9 full extent of Armstrong's intentions," as stated in SENTENCE 13.

10 206. Who ORDERED Sherman to "embark" "on an effort to
11 ascertain the full extent of Armstrong's intentions?"

12 207. IDENTIFY each person who approved any ORDER for Sherman
13 to "embark" "on an effort to ascertain the full extent of
14 Armstrong's intentions."

15 208. IDENTIFY each ORDER for Sherman to "embark" "on an
16 effort to ascertain the full extent of Armstrong's intentions."

17 209. IDENTIFY each ORDER which was shown and/or given to
18 Sherman by anyone connected to the "church" at any time which
19 mentioned, concerned or related in any way to Armstrong.

20 210. WHEN was each of the ORDERS IDENTIFIED in your answer to
21 209 above shown and/or given to Sherman?

22 211. WHERE was each of the ORDERS IDENTIFIED in your answer
23 to 209 above shown and/or given to Sherman?

24 212. IDENTIFY who conveyed each of the ORDERS IDENTIFIED in
25 your answer to 209 above to Sherman.

26 213. IDENTIFY who approved each of the ORDERS IDENTIFIED in
27 your answer to 209 above?

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1 214. IDENTIFY every other DOCUMENT, whether in writing or in
2 any other form, which was shown and/or given to Sherman by anyone
3 connected to the "church" at any time which mentioned, concerned
4 or related in any way to Armstrong.

5 215. WHEN was each of the DOCUMENTS IDENTIFIED in your answer
6 to 214 above shown and/or given to Sherman?

7 216. WHERE was each of the DOCUMENTS IDENTIFIED in your
8 answer to 214 above shown and/or given to Sherman?

9 217. IDENTIFY who showed and/or gave to Sherman each of the
10 DOCUMENTS IDENTIFIED in your answer to 214 above.

11 218. Who approved each showing and/or giving to Sherman of
12 each of the DOCUMENTS IDENTIFIED in your answer to 214 above?

13 219. IDENTIFY each person who was Sherman's "mission ops,"
14 "controller," "handler," or "operator" throughout the "effort to
15 ascertain the full extent of Armstrong's intentions."

16 220. IDENTIFY each person to whom Sherman REPORTED at any
17 time concerning the "effort to ascertain the full extent of
18 Armstrong's intentions."

19 221. IDENTIFY each REPORT Sherman made at any time which
20 mentioned, concerned or related in any way to the alleged "effort
21 to ascertain the full extent of Armstrong's intentions." In these
22 interrogatories, IDENTIFY, when referring to a REPORT, means
23 provide the REPORT'S date, place of origin, whether it was verbal,
24 written or in any other form; the medium on which it travelled;
25 its title; its originator, the originator's post or job title, the
26 report's intended recipient, indicated relay or approval terminals
27 or persons, indicated copy recipients, and each actual recipient;

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1 the text or substance of said REPORT; the present location of
2 known copies; and, the present location of its original.

3 222. IDENTIFY each REPORT Sherman made at any time which
4 mentioned, concerned or related in any way to Armstrong.

5 223. IDENTIFY each person who received each of the REPORTS
6 IDENTIFIED in your answer to 221 and 222 above.

7 224. IDENTIFY WHERE each person IDENTIFIED in your answer to
8 223 above received each of the REPORTS IDENTIFIED in your answer
9 to 221 and 222 above.

10 225. DESCRIBE what Sherman did in the "effort to ascertain
11 the full extent of Armstrong's intentions." In this
12 interrogatory, DESCRIBE means state in plain English what part of
13 all actions taken by all persons who participated in the "effort
14 to ascertain the full extent of Armstrong's intentions" was taken
15 by Sherman.

16 226. IDENTIFY all financial expenditures and/or costs in
17 connection with or relating in any way to the "effort to ascertain
18 the full extent of Armstrong's intentions."

19 227. IDENTIFY the location of the records which reflect the
20 financial expenditures and/or costs IDENTIFIED in your answer to
21 225 above.

22 228. IDENTIFY each sum of money in wages, fees, bribes or
23 reimbursement paid to Sherman in connection with or relating to
24 the "effort to ascertain the full extent of Armstrong's
25 intentions."

26 229. IDENTIFY the location of the records which reflect each
27 sum of money IDENTIFIED in your answer to 228 above.

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1 230. IDENTIFY who wrote SENTENCE 14 (SENTENCE 14 refers to
2 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
3 200050 which states "Sherman informed Armstrong that a group of
4 staff members who were dissatisfied with Church management might
5 be interested in working with him in his efforts to undermine the
6 Church.")

7 231. State each fact on which you base the allegations in
8 SENTENCE 14.

9 232. IDENTIFY each DOCUMENT which supports the allegations in
10 SENTENCE 14.

11 233. WHEN did Sherman first inform "Armstrong that a group of
12 staff members who were dissatisfied with Church management might
13 be interested in working with him in his efforts to undermine the
14 Church?"

15 234. WHERE did Sherman first inform "Armstrong that a group
16 of staff members who were dissatisfied with Church management
17 might be interested in working with him in his efforts to
18 undermine the Church?"

19 235. DESCRIBE what was considered known by anyone connected
20 to the "Church" regarding Armstrong's alleged "efforts to
21 undermine the Church" prior to or at the time "Sherman informed
22 Armstrong that a group of staff members who were dissatisfied with
23 Church management might be interested in working with him in his
24 efforts to undermine the Church"

25 236. Was any statement made by Sherman to Armstrong "that a
26 group of staff members ... were dissatisfied with Church
27 management" a lie?

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1 237. If your answer to the preceding question is "yes,"
2 IDENTIFY each person who ordered Sherman to tell such a lie to
3 Armstrong.

4 238. If your answer to 236 above is "no," IDENTIFY each staff
5 member included or considered in the "group of staff members who
6 were dissatisfied with Church management" as stated in SENTENCE
7 14.

8 239. If your answer to 236 above is "yes," was the telling of
9 such a lie to Armstrong done pursuant to the "fair game" doctrine
10 as delineated in HCO Policy Letter of 18 October 1967 "Penalties
11 for Lower Conditions," which states, "ENEMY - SP Order. Fair game.
12 May be deprived of property or injured by any means by any
13 Scientologist without any discipline of the Scientologist. May be
14 tricked, sued or lied to or destroyed?"

15 240. If your answer to 236 above is "yes," and your answer to
16 the preceding question is "no," IDENTIFY each other Scientology
17 organization policy pursuant to which such a lie was told to
18 Armstrong.

19 241. If your answer to 236 above is "yes," what was the
20 purpose for such a lie?

21 242. IDENTIFY each person connected to the "church" who
22 approved Sherman's informing "Armstrong that a group of staff
23 members who were dissatisfied with Church management might be
24 interested in working with him in his efforts to undermine the
25 Church."

26 243. Did anyone connected to the "police" referred to in
27 SENTENCE 13 advise anyone connected to the "church" to inform
28

1 "Armstrong that a group of staff members who were dissatisfied
2 with Church management might be interested in working with him in
3 his efforts to undermine the Church?"

4 244. If your answer to the preceding question is "yes,"
5 IDENTIFY each person connected to the "police" referred to in
6 SENTENCE 13 who advised anyone connected to the "church" to inform
7 "Armstrong that a group of staff members who were dissatisfied
8 with Church management might be interested in working with him in
9 his efforts to undermine the Church."

10 245. For each person IDENTIFIED in your answer to the
11 preceding question, state when that person advised anyone
12 connected to the "church" to inform "Armstrong that a group of
13 staff members who were dissatisfied with Church management might
14 be interested in working with him in his efforts to undermine the
15 Church."

16 246. For each person IDENTIFIED in your answer to 244 above,
17 state WHERE that person advised anyone connected to the "church"
18 to inform "Armstrong that a group of staff members who were
19 dissatisfied with Church management might be interested in working
20 with him in his efforts to undermine the Church."

21 247. Did anyone connected to the "Church" inform anyone
22 connected to the "police" referred to in SENTENCE 13 of the plan
23 or intention to inform "Armstrong that a group of staff members
24 who were dissatisfied with Church management might be interested
25 in working with him in his efforts to undermine the Church?"

26 248. If your answer to the preceding question is "yes,"
27 IDENTIFY each person connected to the "Church" who informed anyone
28

1 connected to the "police" referred to in SENTENCE 13 of the plan
2 or intention to inform "Armstrong that a group of staff members
3 who were dissatisfied with Church management might be interested
4 in working with him in his efforts to undermine the Church."

5 249. For each person IDENTIFIED in your answer to the
6 preceding question, state WHEN that person advised anyone
7 connected to the "police" referred to in SENTENCE 13 of the plan
8 or intention to inform "Armstrong that a group of staff members
9 who were dissatisfied with Church management might be interested
10 in working with him in his efforts to undermine the Church."

11 250. For each person IDENTIFIED in your answer to the
12 preceding question, state WHERE that person advised anyone
13 connected to the "police" referred to in SENTENCE 13 of the plan
14 or intention to inform "Armstrong that a group of staff members
15 who were dissatisfied with Church management might be interested
16 in working with him in his efforts to undermine the Church."

17 251. For each time IDENTIFIED in your answer to 249 above,
18 IDENTIFY each person connected to the "police" referred to in
19 SENTENCE 13 who was informed by anyone connected to the "church"
20 of the plan or intention to inform "Armstrong that a group of
21 staff members who were dissatisfied with Church management might
22 be interested in working with him in his efforts to undermine the
23 Church."

24 252. IDENTIFY who wrote SENTENCE 15 (SENTENCE 15 refers to
25 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
26 200050 which states "This wholly fictitious group was dubbed "the
27 Loyalists.")

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1 253. State each fact on which you base the allegations in
2 SENTENCE 15.

3 254. IDENTIFY each DOCUMENT which supports the allegations in
4 SENTENCE 15.

5 255. IDENTIFY who "dubbed" "the Loyalists" ""the Loyalists?""

6 256. WHEN did the person or persons IDENTIFIED in your answer
7 to the preceding question dub "the Loyalists" ""the Loyalists?""

8 257. WHERE did the person or persons IDENTIFIED in your
9 answer to the preceding question dub "the Loyalists" ""the
10 Loyalists?""

11 258. IDENTIFY each person who approved dubbing "the
12 Loyalists" ""the Loyalists"."

13 259. IDENTIFY each DOCUMENT of any kind which mentions,
14 refers to, or relates in any way to the "group ... dubbed "the
15 Loyalists."

16 260. IDENTIFY each ORDER given to Sherman by anyone connected
17 to the "Church" which mentions, refers to, or relates in any way
18 to the "the Loyalists."

19 261. IDENTIFY who gave to Sherman each ORDER IDENTIFIED in
20 your answer to the preceding question?

21 262. WHEN was each ORDER IDENTIFIED in your answer to 260
22 above given to Sherman?

23 263. WHERE was each ORDER IDENTIFIED in your answer to 260
24 above given to Sherman?

25 264. IDENTIFY each person who approved each ORDER IDENTIFIED
26 in your answer to 260 above.

27 265. IDENTIFY who wrote SENTENCE 16 (SENTENCE 16 refers to
28

1 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
2 200050 which states "Sherman enlisted the aid of two other
3 persons, David Kluge and Mike Rinder, who agreed to pose as
4 "Loyalists" and meet with Armstrong.")

5 266. State each fact on which you base the allegations in
6 SENTENCE 16.

7 267. IDENTIFY each DOCUMENT which supports the allegations in
8 SENTENCE 16.

9 268. WHEN did Sherman enlist "the aid of two other persons,
10 David Kluge and Mike Rinder," as stated in SENTENCE 16?

11 269. WHERE did Sherman enlist "the aid of two other persons,
12 David Kluge and Mike Rinder," as stated in SENTENCE 16?

13 270. DESCRIBE what Sherman did and said at any time for the
14 purpose of or in the course of enlisting "the aid of two other
15 persons, David Kluge and Mike Rinder," as stated in SENTENCE 16.

16 271. DESCRIBE what David Kluge did or said at any time
17 concerning or relating in any way to his being "enlisted" by
18 Sherman or anyone else connected to the "church" "to pose as
19 "Loyalists" and meet with Armstrong," as stated in SENTENCE 16.

20 272. DESCRIBE what Mike Rinder did or said at any time
21 concerning or relating in any way to his being "enlisted" by
22 Sherman or anyone else connected to the "church" "to pose as
23 "Loyalists" and meet with Armstrong," as stated in SENTENCE 16.

24 273. At the time IDENTIFIED in your answer to 268 above what
25 was David Kluge's POST in the Scientology organization? In these
26 interrogatories, IDENTIFYING a Scientology POST means provide the
27 post title, org board location, physical office location,
28

1 organization and ostensible corporation containing such post, and
2 organization senior.

3 274. DESCRIBE all the FUNCTIONS of David Kluge's POST in the
4 Scientology organization at the time IDENTIFIED in your answer to
5 268 above. In these interrogatories, IDENTIFYING the FUNCTIONS of
6 a Scientology POST means provide the post purpose and all duties,
7 as such are understood according to Scientology administrative
8 policies, and the actual purpose and duties.

9 275. At the time IDENTIFIED in your answer to 268 above
10 IDENTIFY each person who approved David Kluge's enlistment "to
11 pose as [a] "Loyalist" and meet with Armstrong?"

12 276. Was David Kluge ever a member or operative of
13 Scientology's Guardian's Office?

14 277. If your answer to the preceding question was "yes,"
15 IDENTIFY each PERIOD OF TIME during which David Kluge was a member
16 or operative of the Guardian's Office.

17 278. If your answer to 276 above is "yes," IDENTIFY each POST
18 Kluge held in the Guardian's Office and each operation he
19 participated in for the Guardian's Office during each period
20 IDENTIFIED in your answer to the preceding question.

21 279. For each POST or operation IDENTIFIED in your preceding
22 answer DESCRIBE all its FUNCTIONS.

23 280. Subsequent to the time IDENTIFIED in your answer to 268
24 above IDENTIFY each of David Kluge's POSTS in the Scientology
25 organization?

26 281. For each POST IDENTIFIED in your answer to the preceding
27 question, IDENTIFY the time period David Kluge was on it.

28

1 282. For each post IDENTIFIED in your answer to 280 above
2 DESCRIBE all its FUNCTIONS.

3 283. At the time IDENTIFIED in your answer to 268 above what
4 was Mike Rinder's POST in the Scientology organization?

5 284. DESCRIBE all the FUNCTIONS of Mike Rinder's POST in the
6 Scientology organization at the time IDENTIFIED in your answer to
7 268 above.

8 285. At the time IDENTIFIED in your answer to 268 above
9 IDENTIFY each person who approved Mike Rinder's enlistment "to
10 pose as "Loyalists" and meet with Armstrong?"

11 286. Subsequent to the time IDENTIFIED in your answer to 268
12 above IDENTIFY each of Mike Rinder's POSTS in the Scientology
13 organization?

14 287. For each post IDENTIFIED in your answer to the preceding
15 question, IDENTIFY WHEN Mike Rinder was on it.

16 288. For each post IDENTIFIED in your answer to 286 above
17 DESCRIBE all its FUNCTIONS.

18 289. IDENTIFY each sum of money in wages, fees, bribes or
19 reimbursement paid to David Kluge for his agreement "to pose as
20 [a] "Loyalist" and meet with Armstrong," and for his participation
21 in such operation as described in SENTENCE 16?

22 290. IDENTIFY each sum of money in wages, fees, bribes or
23 reimbursement paid to Mike Rinder for his agreement "to pose as
24 [a] "Loyalist" and meet with Armstrong," and for his participation
25 in such operation as described in SENTENCE 16?

26 291. IDENTIFY the location of the records which reflect the
27 financial expenditures and/or costs IDENTIFIED in your answers to
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1 289 and 290 above.

2 292. IDENTIFY each REPORT made by David Kluge to anyone
3 connected to the "church" which mentions, concerns or relates in
4 any way to posing as a "Loyalist" or meeting "with Armstrong."

5 293. IDENTIFY each REPORT not already IDENTIFIED in your
6 answer to 292 above, made at any time by David Kluge to anyone
7 connected to the "church" which mentions, concerns or relates in
8 any way to Sherman or Armstrong.

9 294. IDENTIFY each ORDER given to David Kluge by anyone
10 connected to the "church" which mentions, concerns or relates in
11 any way to posing as a "Loyalist" or meeting "with Armstrong."

12 295. WHEN was each ORDER IDENTIFIED in your answer to the
13 preceding question given to David Kluge?

14 296. WHERE was each ORDER IDENTIFIED in your answer to 294
15 above given to David Kluge?

16 297. IDENTIFY each person who approved each ORDER IDENTIFIED
17 in your answer to 294 above.

18 298. IDENTIFY each ORDER or COMMUNICATION of any kind or
19 nature whatsoever, not already IDENTIFIED in your answer to 294
20 above, given to David Kluge by anyone connected to the "church"
21 which mentions, concerns or relates in any way to Sherman or
22 Armstrong.

23 299. WHEN was each ORDER IDENTIFIED in your answer to the
24 preceding question given to David Kluge?

25 300. WHERE was each ORDER IDENTIFIED in your answer to 298
26 above given to David Kluge?

27 301. IDENTIFY each person who approved each ORDER IDENTIFIED
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1 in your answer to 298 above.

2 302. IDENTIFY each REPORT whether in writing, oral or in any
3 other form made by Mike Rinder to anyone connected to the "church"
4 which mentions, concerns or relates in any way to posing as a
5 "Loyalist" or meeting "with Armstrong."

6 303. IDENTIFY each REPORT whether in writing, oral or in any
7 other form, not already IDENTIFIED in your answer to 302 above,
8 made by Mike Rinder to anyone connected to the "church" which
9 mentions, concerns or relates in any way to Sherman or Armstrong.

10 304. IDENTIFY each ORDER whether in writing, oral or in any
11 other form given to Mike Rinder by anyone connected to the
12 "church" which mentions, concerns or relates in any way to posing
13 as a "Loyalist" or meeting "with Armstrong."

14

15 305. IDENTIFY each person who approved each ORDER IDENTIFIED
16 in your answer to 304 above.

17 306. IDENTIFY each ORDER whether in writing, oral or in any
18 other form, not already IDENTIFIED in your answer to 304 above,
19 given to Mike Rinder by anyone connected to the "church" which
20 mentions, concerns or relates in any way to Sherman or Armstrong.

21 307. WHERE was each ORDER IDENTIFIED in your answer to 341
22 above given to Mike Rinder?

23 308. IDENTIFY each person who approved each ORDER IDENTIFIED
24 in your answer to 306 above.

25 309. IDENTIFY all financial expenditures and/or costs in
26 connection with or relating in any way to any operation or
27 activity involving David Kluge and/or Mike Rinder posing "as
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1 "Loyalists" and meet[ing] with Armstrong," as referred to in
2 SENTENCE 16.

3 310. IDENTIFY the location of the records which reflect the
4 financial expenditures and/or costs IDENTIFIED in your answer to
5 the preceding question.

6 311. IDENTIFY each policy of the Scientology organization
7 pursuant to which David Kluge and/or Mike Rinder posed "as
8 "Loyalists" and [met] with Armstrong."

9 312. IDENTIFY who wrote SENTENCE 17 (SENTENCE 17 refers to
10 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
11 200050 which states "Kluge first assumed the code name "Joey," and
12 first met with Armstrong in the late summer of 1984.")

13 313. State each fact on which you base the allegations in
14 SENTENCE 17.

15 314. IDENTIFY each DOCUMENT which supports the allegations in
16 SENTENCE 17.

17 315. WHEN did Kluge first assume "the code name "Joey?"

18 316. WHERE did Kluge first assume "the code name "Joey?"

19 317. IDENTIFY who approved Kluge's assuming "the code name
20 "Joey?"

21 318. On what date did Kluge "first me[e]t with Armstrong in
22 the late summer of 1984?"

23 319. WHERE did Kluge "first me[e]t with Armstrong in the late
24 summer of 1984?"

25 320. Was any videotape recording made of Kluge's first
26 meeting with Armstrong?

27 321. If your answer to the preceding question is "yes,"
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1 IDENTIFY WHERE such original videotape recording and all known
2 copies are located.

3 322. Was any audio recording made of Kluge's first meeting
4 with Armstrong?

5 323. If your answer to the preceding question is "yes,"
6 IDENTIFY WHERE such original audio recording and all known copies
7 are located.

8 324. IDENTIFY every ORDER given to Kluge prior to first
9 meeting Armstrong.

10 325. IDENTIFY WHERE each ORDER IDENTIFIED in your answer to
11 324 above was given to Kluge.

12 326. IDENTIFY each person who approved each ORDER IDENTIFIED
13 in your answer to 324 above.

14 327. IDENTIFY each REPORT made by Kluge, which mentioned,
15 concerned or related in any way to his "first me[e]t[ing] with
16 Armstrong?"

17 328. IDENTIFY WHERE each REPORT IDENTIFIED in your answer to
18 327 above was made by Kluge.

19 329. IDENTIFY who wrote SENTENCE 18 (SENTENCE 18 refers to
20 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
21 200050 which states "Armstrong told "Joey" that part of his plan
22 was to use the auspices of the Internal Revenue Service to attack
23 the Church.")

24 330. State each fact on which you base the allegations in
25 SENTENCE 18.

26 331. IDENTIFY each DOCUMENT which supports the allegations in
27 SENTENCE 18.

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1 332. WHEN did Armstrong allegedly tell Kluge "that part of
2 his plan was to use the auspices of the Internal Revenue Service
3 to attack the Church?"

4 333. WHERE did Armstrong allegedly tell Kluge "that part of
5 his plan was to use the auspices of the Internal Revenue Service
6 to attack the Church?"

7 334. Was any videotape recording made of Kluge's meeting with
8 Armstrong when Armstrong allegedly told Kluge "that part of his
9 plan was to use the auspices of the Internal Revenue Service to
10 attack the Church?"

11 335. If your answer to the preceding question is "yes,"
12 IDENTIFY WHERE such original videotape recording, and all copies
13 thereof, are located.

14 336. If your answer to 334 above is "yes," IDENTIFY each
15 person who was involved in any way in the making of said videotape
16 recording.

17 337. For each person IDENTIFIED in your answer to the
18 preceding question DESCRIBE his or her participation in any way in
19 the making of said videotape recording.

20 338. If your answer to 334 above is "yes," IDENTIFY each
21 person who approved the making of said videotape recording.

22 339. If your answer to 334 above is "yes," IDENTIFY each sum
23 of money in wages, fees, bribes or reimbursement paid to anyone at
24 any time for anything done in connection with or relating in any
25 way to the making of said videotape recording.

26 340. IDENTIFY the location of the records which reflect the
27 financial expenditures and/or costs IDENTIFIED in your answer to
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1 the preceding question.

2 341. If your answer to 334 above is "yes," were any copies or
3 portions of copies of said videotape edited or altered in any way
4 whatsoever.

5 342. If your answer to the preceding question is "yes,"
6 DESCRIBE each instance of such editing or altering.

7 343. If your answer to 341 above is "yes," IDENTIFY each
8 person who participated in any way in such editing or altering.

9 344. If your answer to 341 above is "yes," IDENTIFY each sum
10 of money in wages, fees, bribes or reimbursement paid to anyone at
11 any time for anything done in connection with or relating in any
12 way to the editing or altering of said videotape recording.

13 345. IDENTIFY the location of the records which reflect the
14 financial expenditures and/or costs IDENTIFIED in your answer to
15 the preceding question.

16 346. Was any audio recording made of Kluge's meeting with
17 Armstrong when Armstrong allegedly told Kluge "that part of his
18 plan was to use the auspices of the Internal Revenue Service to
19 attack the Church?"

20 347. If your answer to the preceding question is "yes,"
21 IDENTIFY WHERE such audio recording, and all copies thereof, are
22 located.

23 348. If your answer to 346 above is "yes," IDENTIFY each
24 person who was involved in any way in the making of said audio
25 recording.

26 349. For each person IDENTIFIED in your answer to the
27 preceding question DESCRIBE his or her participation in any way in
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1 the making of said audio recording.

2 350. If your answer to 346 above is "yes," IDENTIFY each
3 person who approved the making of said audio recording.

4 351. If your answer to 346 above is "yes," IDENTIFY each sum
5 of money in wages, fees, bribes or reimbursement paid to anyone at
6 any time for anything done in connection with or relating in any
7 way to the making of said audio recording.

8 352. IDENTIFY the location of the records which reflect the
9 financial expenditures and/or costs IDENTIFIED in your answer to
10 the preceding question.

11 353. IDENTIFY every ORDER concerning in any way Kluge's
12 meeting with Armstrong in which Armstrong allegedly told Kluge
13 "that part of his plan was to use the auspices of the Internal
14 Revenue Service to attack the Church," given to Kluge by anyone
15 connected to the "Church."

16 354. IDENTIFY WHERE each ORDER IDENTIFIED in your answer to
17 353 above was given to Kluge.

18 355. IDENTIFY each person who approved each ORDER IDENTIFIED
19 in your answer to 353 above.

20 356. IDENTIFY every REPORT Kluge made to anyone connected to
21 the "Church" which mentioned, concerned or related in any way to
22 his meeting with Armstrong when Armstrong allegedly told Kluge
23 "that part of his plan was to use the auspices of the Internal
24 Revenue Service to attack the Church."

25 357. State the exact words Armstrong said to Kluge which have
26 been interpreted as "part of his plan was to use the auspices of
27 the Internal Revenue Service to attack the Church," as stated in
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1 SENTENCE 18.

2 358. IDENTIFY who wrote SENTENCE 19 (SENTENCE 19 refers to
3 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
4 200050 which states "Armstrong wanted "Joey" to plant in the
5 Church's files the documents Armstrong would fabricate, so that
6 Armstrong could tell the Criminal Investigation Division (CID) of
7 the Los Angeles IRS office to conduct a raid and find the
8 "incriminating" documents.")

9 359. State each fact on which you base the allegations in
10 SENTENCE 19.

11 360. IDENTIFY each DOCUMENT which supports the allegations in
12 SENTENCE 19.

13 361. WHEN did Armstrong allegedly tell Kluge "to plant in the
14 Church's files the documents Armstrong would fabricate, so that
15 Armstrong could tell the Criminal Investigation Division (CID) of
16 the Los Angeles IRS office to conduct a raid and find the
17 "incriminating" documents?"

18 362. WHERE did Armstrong allegedly tell Kluge "to plant in
19 the Church's files the documents Armstrong would fabricate, so
20 that Armstrong could tell the Criminal Investigation Division
21 (CID) of the Los Angeles IRS office to conduct a raid and find the
22 "incriminating" documents?"

23 363. Was any videotape recording made of Kluge's meeting with
24 Armstrong when Armstrong allegedly told Kluge "to plant in the
25 Church's files the documents Armstrong would fabricate, so that
26 Armstrong could tell the Criminal Investigation Division (CID) of
27 the Los Angeles IRS office to conduct a raid and find the
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1 "incriminating" documents?"

2 364. If your answer to the preceding question is "yes,"
3 IDENTIFY WHERE such original videotape recording, and all copies
4 thereof, are located.

5 365. If your answer to 363 above is "yes," IDENTIFY each
6 person who was involved in any way in the making of said videotape
7 recording.

8 366. For each person IDENTIFIED in your answer to the
9 preceding question DESCRIBE his or her participation in any way in
10 the making of said videotape recording.

11 367. If your answer to 363 above is "yes," IDENTIFY each
12 person who approved the making of said videotape recording.

13 368. If your answer to 363 above is "yes," IDENTIFY each sum
14 of money in wages, fees, bribes or reimbursement paid to anyone at
15 any time for anything done in connection with or relating in any
16 way to the making of said videotape recording.

17 369. IDENTIFY the location of the records which reflect the
18 financial expenditures and/or costs IDENTIFIED in your answer to
19 the preceding question.

20 370. If your answer to 363 above is "yes," were any copies or
21 portions of copies of said videotape edited or altered in any way
22 whatsoever?

23 371. If your answer to the preceding question is "yes,"
24 DESCRIBE each instance of such editing or altering.

25 372. If your answer to 370 above is "yes," IDENTIFY each
26 person who participated in any way in such editing or altering.

27 373. If your answer to 370 above is "yes," IDENTIFY each sum
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1 of money in wages, fees, bribes or reimbursement paid to anyone at
2 any time for anything done in connection with or relating in any
3 way to the editing or altering of said videotape recording.

4 374. IDENTIFY the location of the records which reflect the
5 financial expenditures and/or costs IDENTIFIED in your answer to
6 the preceding question.

7 375. Was any audio recording made of Kluge's meeting with
8 Armstrong when Armstrong allegedly told Kluge "to plant in the
9 Church's files the documents Armstrong would fabricate, so that
10 Armstrong could tell the Criminal Investigation Division (CID) of
11 the Los Angeles IRS office to conduct a raid and find the
12 "incriminating" documents?"

13 376. If your answer to the preceding question is "yes,"
14 IDENTIFY WHERE such audio recording, and all copies thereof, are
15 located.

16 377. If your answer to 375 above is "yes," IDENTIFY each
17 person who was involved in any way in the making of said audio
18 recording.

19 378. For each person IDENTIFIED in your answer to the
20 preceding question DESCRIBE his or her participation in any way in
21 the making of said audio recording.

22 379. If your answer to 375 above is "yes," IDENTIFY each
23 person who approved the making of said audio recording.

24 380. If your answer to 375 above is "yes," IDENTIFY each sum
25 of money in wages, fees, bribes or reimbursement paid to anyone at
26 any time for anything done in connection with or relating in any
27 way to the making of said audio recording.

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1 381. IDENTIFY the location of the records which reflect the
2 financial expenditures and/or costs IDENTIFIED in your answer to
3 the preceding question.

4 382. IDENTIFY every ORDER given to Kluge at any time by
5 anyone connected to the "Church" concerning in any way Kluge's
6 meeting with Armstrong in which Armstrong allegedly told Kluge "to
7 plant in the Church's files the documents Armstrong would
8 fabricate, so that Armstrong could tell the Criminal Investigation
9 Division (CID) of the Los Angeles IRS office to conduct a raid and
10 find the "incriminating" documents."

11 383. IDENTIFY WHERE each ORDER IDENTIFIED in your answer to
12 382 above was given to Kluge.

13 384. IDENTIFY each person who approved each ORDER IDENTIFIED
14 in your answer to 382 above.

15 385. IDENTIFY every REPORT Kluge made to anyone connected to
16 the "Church" which mentioned, concerned or related in any way to
17 his meeting with Armstrong when Armstrong allegedly told Kluge "to
18 plant in the Church's files the documents Armstrong would
19 fabricate, so that Armstrong could tell the Criminal Investigation
20 Division (CID) of the Los Angeles IRS office to conduct a raid and
21 find the "incriminating" documents."

22 386. State the exact words Armstrong said to Kluge which have
23 been interpreted as "Armstrong want[ing] "Joey" to plant in the
24 Church's files the documents Armstrong would fabricate, so that
25 Armstrong could tell the Criminal Investigation Division (CID) of
26 the Los Angeles IRS office to conduct a raid and find the
27 "incriminating" documents;" as stated in SENTENCE 19.

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1 387. IDENTIFY who wrote SENTENCE 20 (SENTENCE 20 refers to
2 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
3 200050 which states "He reassured "Joey" that he would be able to
4 create the needed documents "with relative ease" since he had done
5 it for a living.")

6 388. State each fact on which you base the allegations in
7 SENTENCE 20.

8 389. IDENTIFY each DOCUMENT which supports the allegations in
9 SENTENCE 20.

10 390. IDENTIFY each person as referred to in SENTENCE 20 who
11 "needed" the "documents" that Armstrong allegedly said he would be
12 able to create.

13 391. IDENTIFY who wrote SENTENCE 21 (SENTENCE 21 refers to
14 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
15 200051 which states "Armstrong also made it clear that he had
16 developed a personal program intended to undermine and eventually
17 destroy the Church.")

18 392. State each fact on which you base the allegations in
19 SENTENCE 21.

20 393. IDENTIFY each DOCUMENT which supports the allegations in
21 SENTENCE 21.

22 394. WHEN did Armstrong allegedly make "it clear that he had
23 developed a personal program intended to undermine and eventually
24 destroy the Church?"

25 395. WHERE did Armstrong allegedly make "it clear that he had
26 developed a personal program intended to undermine and eventually
27 destroy the Church?"

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1 396. IDENTIFY each person to whom Armstrong allegedly "made
2 it clear that he had developed a personal program intended to
3 undermine and eventually destroy the Church?"

4 397. Was any videotape recording made of any meeting or time
5 in which Armstrong allegedly "made it clear that he had developed
6 a personal program intended to undermine and eventually destroy
7 the Church?"

8 398. If your answer to the preceding question is "yes,"
9 IDENTIFY WHERE such original videotape recording, and all copies
10 thereof, are located.

11 399. If your answer to 398 above is "yes," IDENTIFY each
12 person who was involved in any way in the making of said videotape
13 recording.

14 400. For each person IDENTIFIED in your answer to the
15 preceding question DESCRIBE his or her participation in any way in
16 the making of said videotape recording.

17 401. If your answer to 398 above is "yes," IDENTIFY each
18 person who approved the making of said videotape recording.

19 402. If your answer to 398 above is "yes," IDENTIFY each sum
20 of money in wages, fees, bribes or reimbursement paid to anyone at
21 any time for anything done in connection with or relating in any
22 way to the making of said videotape recording.

23 403. IDENTIFY the location of the records which reflect the
24 financial expenditures and/or costs IDENTIFIED in your answer to
25 the preceding question.

26 404. If your answer to 398 above is "yes," were any copies or
27 portions of copies of said videotape edited or altered in any way
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1 whatsoever?

2 405. If your answer to the preceding question is "yes,"
3 DESCRIBE each instance of such editing or altering.

4 406. If your answer to 404 above is "yes," IDENTIFY each
5 person who participated in any way in such editing or altering.

6 407. If your answer to 404 above is "yes," IDENTIFY each sum
7 of money in wages, fees, bribes or reimbursement paid to anyone at
8 any time for anything done in connection with or relating in any
9 way to the editing or altering of said videotape recording.

10 408. IDENTIFY the location of the records which reflect the
11 financial expenditures and/or costs IDENTIFIED in your answer to
12 the preceding question.

13 409. Was any audio recording made of any meeting or time in
14 which Armstrong allegedly "made it clear that he had developed a
15 personal program intended to undermine and eventually destroy the
16 Church?"

17 410. If your answer to the preceding question is "yes,"
18 IDENTIFY WHERE such audio recording, and all copies thereof, are
19 located.

20 411. If your answer to 409 above is "yes," IDENTIFY each
21 person who was involved in any way in the making of said audio
22 recording.

23 412. For each person IDENTIFIED in your answer to the
24 preceding question DESCRIBE his or her participation in any way in
25 the making of said audio recording.

26 413. If your answer to 409 above is "yes," IDENTIFY each
27 person who approved the making of said audio recording.

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1 414. If your answer to 409 above is "yes," IDENTIFY each sum
2 of money in wages, fees, bribes or reimbursement paid to anyone at
3 any time for anything done in connection with or relating in any
4 way to the making of said audio recording.

5 415. IDENTIFY the location of the records which reflect the
6 financial expenditures and/or costs IDENTIFIED in your answer to
7 the preceding question.

8 416. Prior to or after the time or times when Armstrong
9 allegedly "made it clear that he had developed a personal program
10 intended to undermine and eventually destroy the Church," was the
11 person or persons to whom Armstrong made such clear given any
12 ORDER of any kind or nature whatsoever by anyone connected to the
13 "Church" which mentioned, concerned or related in any way to
14 Armstrong?

15 417. If your answer to the preceding question is "yes,"
16 IDENTIFY each such ORDER.

17 418. If your answer to 416 above is "yes," IDENTIFY WHERE
18 each such ORDER was given.

19 419. If your answer to 416 above is "yes," IDENTIFY each
20 person who approved each such ORDER.

21 420. Did the person or persons IDENTIFIED in your answer to
22 396 above make any REPORT, of any kind or nature whatsoever to
23 anyone connected to the "Church" which mentioned, concerned or
24 related in any way to Armstrong?

25 421. If your answer to the preceding question is "yes,"
26 IDENTIFY each such REPORT.

27 422. IDENTIFY WHERE each REPORT IDENTIFIED in your answer to
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1 421 above was made.

2 423. State the exact words said by Armstrong and DESCRIBE the
3 exact actions taken by Armstrong which have been interpreted as
4 "Armstrong also made it clear that he had developed a personal
5 program intended to undermine and eventually destroy the Church;"
6 as stated in SENTENCE 21.

7 424. IDENTIFY who wrote SENTENCE 22 (SENTENCE 22 refers to
8 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
9 200051 which states "His goals were to oust the current management
10 of Scientology, to obtain an advisory position within the
11 restructured Church by becoming a consultant to the "Loyalists"
12 and to plunder the Church for his own financial gain;" hereinafter
13 "SENTENCE 22."

14 425. State each fact on which you base the allegations in
15 SENTENCE 22.

16 426. IDENTIFY each DOCUMENT which supports the allegations in
17 SENTENCE 22.

18 427. WHEN did Armstrong allegedly communicate that his "goals
19 were to oust the current management of Scientology, to obtain an
20 advisory position within the restructured Church by becoming a
21 consultant to the "Loyalists" and to plunder the Church for his
22 own financial gain?"

23 428. WHERE did Armstrong allegedly communicate that his
24 "goals were to oust the current management of Scientology, to
25 obtain an advisory position within the restructured Church by
26 becoming a consultant to the "Loyalists" and to plunder the Church
27 for his own financial gain?"

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1 429. IDENTIFY each person to whom Armstrong allegedly
2 communicated that his "goals were to oust the current management
3 of Scientology, to obtain an advisory position within the
4 restructured Church by becoming a consultant to the "Loyalists"
5 and to plunder the Church for his own financial gain."

6 430. Was any videotape recording made of any meeting or time
7 in which Armstrong allegedly communicated that his "goals were to
8 oust the current management of Scientology, to obtain an advisory
9 position within the restructured Church by becoming a consultant
10 to the "Loyalists" and to plunder the Church for his own financial
11 gain?"

12 431. If your answer to the preceding question is "yes,"
13 IDENTIFY WHERE such original videotape recording, and all copies
14 thereof, are located.

15 432. If your answer to 430 above is "yes," IDENTIFY each
16 person who was involved in any way in the making of said videotape
17 recording.

18 433. For each person IDENTIFIED in your answer to the
19 preceding question DESCRIBE his or her participation in any way in
20 the making of said videotape recording.

21 434. If your answer to 430 above is "yes," IDENTIFY each
22 person who approved the making of said videotape recording.

23 435. If your answer to 430 above is "yes," IDENTIFY each sum
24 of money in wages, fees, bribes or reimbursement paid to anyone at
25 any time for anything done in connection with or relating in any
26 way to the making of said videotape recording.

27 436. IDENTIFY the location of the records which reflect the
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1 financial expenditures and/or costs IDENTIFIED in your answer to
2 the preceding question.

3 437. If your answer to 430 above is "yes," were any copies or
4 portions of copies of said videotape edited or altered in any way
5 whatsoever?

6 438. If your answer to the preceding question is "yes,"
7 DESCRIBE each instance of such editing or altering.

8 439. If your answer to 437 above is "yes," IDENTIFY each
9 person who participated in any way in such editing or altering.

10 440. If your answer to 437 above is "yes," IDENTIFY each sum
11 of money in wages, fees, bribes or reimbursement paid to anyone at
12 any time for anything done in connection with or relating in any
13 way to the editing or altering of said videotape recording.

14 441. IDENTIFY the location of the records which reflect the
15 financial expenditures and/or costs IDENTIFIED in your answer to
16 the preceding question.

17 442. Was any audio recording made of any meeting or time in
18 which Armstrong allegedly communicated that his "goals were to
19 oust the current management of Scientology, to obtain an advisory
20 position within the restructured Church by becoming a consultant
21 to the "Loyalists" and to plunder the Church for his own financial
22 gain?"

23 443. If your answer to the preceding question is "yes,"
24 IDENTIFY WHERE such audio recording, and all copies thereof, are
25 located.

26 444. If your answer to 442 above is "yes," IDENTIFY each
27 person who was involved in any way in the making of said audio
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1 recording.

2 445. For each person IDENTIFIED in your answer to the
3 preceding question DESCRIBE his or her participation in any way in
4 the making of said audio recording.

5 446. If your answer to 442 above is "yes," IDENTIFY each
6 person who approved the making of said audio recording.

7 447. If your answer to 442 above is "yes," IDENTIFY each sum
8 of money in wages, fees, bribes or reimbursement paid to anyone at
9 any time for anything done in connection with or relating in any
10 way to the making of said audio recording.

11 448. IDENTIFY the location of the records which reflect the
12 financial expenditures and/or costs IDENTIFIED in your answer to
13 the preceding question.

14 449. Prior to or after the time or times when Armstrong
15 allegedly communicated that his "goals were to oust the current
16 management of Scientology, to obtain an advisory position within
17 the restructured Church by becoming a consultant to the
18 "Loyalists" and to plunder the Church for his own financial gain"
19 was the person or persons IDENTIFIED in your answer to 429 above
20 given any ORDER or COMMUNICATION of any kind or nature whatsoever
21 by anyone connected to the "Church" which mentioned, concerned or
22 related in any way to Armstrong?

23 450. If your answer to the preceding question is "yes,"
24 IDENTIFY each such ORDER or COMMUNICATION.

25 451. IDENTIFY each person who approved each ORDER or
26 COMMUNICATION IDENTIFIED in your answer to the preceding question.

27 452. Did the person or persons IDENTIFIED in your answer to
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1 429 above at any time make any REPORT of and kind or nature to
2 anyone connected to the "Church" which mentioned, concerned or
3 related in any way to Armstrong?

4 453. If your answer to the preceding question is "yes,"
5 IDENTIFY each such REPORT.

6 454. If your answer to 452 above is "yes," IDENTIFY WHERE
7 each such REPORT was made.

8 455. State the exact words said by Armstrong and DESCRIBE the
9 exact actions taken by Armstrong which have been interpreted as
10 "His goals were to oust the current management of Scientology, to
11 obtain an advisory position within the restructured Church by
12 becoming a consultant to the "Loyalists" and to plunder the Church
13 for his own financial gain," as stated in SENTENCE 22.

14 456. IDENTIFY who wrote SENTENCE 23 (SENTENCE 23 refers to
15 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
16 200051 which states "His program to remove current Church
17 management included the filing of a civil suit, based on evidence
18 that he would manufacture.")

19 457. State each fact on which you base the allegations in
20 SENTENCE 23.

21 458. IDENTIFY each DOCUMENT which supports the allegations in
22 SENTENCE 23.

23 459. WHEN did Armstrong allegedly communicate his alleged
24 plan or intention to file "a civil suit, based on evidence that he
25 would manufacture?"

26 460. WHERE did Armstrong allegedly communicate his alleged
27 plan or intention to file "a civil suit, based on evidence that he
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1 would manufacture?"

2 461. IDENTIFY each person to whom Armstrong allegedly
3 communicated his alleged plan or intention to file "a civil suit,
4 based on evidence that he would manufacture."

5 462. Was any videotape recording made of any meeting or time
6 in which Armstrong allegedly communicated his alleged plan or
7 intention to file "a civil suit, based on evidence that he would
8 manufacture?"

9 463. If your answer to the preceding question is "yes,"
10 IDENTIFY WHERE such original videotape recording, and all copies
11 thereof, are located.

12 464. If your answer to 462 above is "yes," IDENTIFY each
13 person who was involved in any way in the making of said videotape
14 recording.

15 465. For each person IDENTIFIED in your answer to the
16 preceding question DESCRIBE his or her participation in any way in
17 the making of said videotape recording.

18 466. If your answer to 462 above is "yes," IDENTIFY each
19 person who approved the making of said videotape recording.

20 467. If your answer to 462 above is "yes," IDENTIFY each sum
21 of money in wages, fees, bribes or reimbursement paid to anyone at
22 any time for anything done in connection with or relating in any
23 way to the making of said videotape recording.

24 468. IDENTIFY the location of the records which reflect the
25 financial expenditures and/or costs IDENTIFIED in your answer to
26 the preceding question.

27 469. If your answer to 462 above is "yes," were any copies or
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1 portions of copies of said videotape edited or altered in any way
2 whatsoever?

3 470. If your answer to the preceding question is "yes,"
4 DESCRIBE each instance of such editing or altering.

5 471. If your answer to 469 above is "yes," IDENTIFY each
6 person who participated in any way in such editing or altering.

7 472. If your answer to 469 above is "yes," IDENTIFY each sum
8 of money in wages, fees, bribes or reimbursement paid to anyone at
9 any time for anything done in connection with or relating in any
10 way to the editing or altering of said videotape recording.

11 473. IDENTIFY the location of the records which reflect the
12 financial expenditures and/or costs IDENTIFIED in your answer to
13 the preceding question.

14 474. Was any audio recording made of any meeting or time in
15 which Armstrong allegedly communicated his alleged plan or
16 intention to file "a civil suit, based on evidence that he would
17 manufacture?"

18 475. If your answer to the preceding question is "yes,"
19 IDENTIFY WHERE such audio recording, and all copies thereof, are
20 located.

21 476. If your answer to 474 above is "yes," IDENTIFY each
22 person who was involved in any way in the making of said audio
23 recording.

24 477. For each person IDENTIFIED in your answer to the
25 preceding question DESCRIBE his or her participation in any way in
26 the making of said audio recording.

27 478. If your answer to 474 above is "yes," IDENTIFY each
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1 person who approved the making of said audio recording.

2 479. If your answer to 474 above is "yes," IDENTIFY each sum
3 of money in wages, fees, bribes or reimbursement paid to anyone at
4 any time for anything done in connection with or relating in any
5 way to the making of said audio recording.

6 480. IDENTIFY the location of the records which reflect the
7 financial expenditures and/or costs IDENTIFIED in your answer to
8 the preceding question.

9 481. Prior to or after the time or times when Armstrong
10 allegedly communicated his alleged plan or intention to file "a
11 civil suit, based on evidence that he would manufacture," was the
12 person or persons IDENTIFIED in your answer to 461 above given any
13 ORDER or COMMUNICATION of any kind or nature whatsoever by anyone
14 connected to the "Church" which mentioned, concerned or related in
15 any way to Armstrong?

16 482. If your answer to the preceding question is "yes,"
17 IDENTIFY each such ORDER or COMMUNICATION.

18 483. IDENTIFY each person who approved each ORDER or
19 COMMUNICATION IDENTIFIED in your answer to the preceding question.

20 484. Did the person or persons IDENTIFIED in your answer to
21 461 above at any time make any REPORT of any kind or nature
22 whatsoever to anyone connected to the "Church" which mentioned,
23 concerned or related in any way to Armstrong?

24 485. If your answer to the preceding question is "yes,"
25 IDENTIFY each such REPORT.

26 486. If your answer to 484 above is "yes," IDENTIFY WHERE
27 each such REPORT was made.

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1 487. State the exact words said by Armstrong and DESCRIBE the
2 exact actions taken by Armstrong which have been interpreted as
3 "His program to remove current Church management included the
4 filing of a civil suit, based on evidence that he would
5 manufacture;" as stated in SENTENCE 23.

6 488. IDENTIFY who wrote SENTENCE 24 (SENTENCE 24 refers to
7 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped
8 pages 200051 and 200052 which states "Armstrong's goal, as
9 revealed in his own words on videotape was to overthrow existing
10 Church management and to set up in its place a new set of Church
11 executives who would settle all of the civil damages suits brought
12 against the Church by the attorneys representing Armstrong.")

13 489. State each fact on which you base the allegations in
14 SENTENCE 24.

15 490. IDENTIFY each DOCUMENT which supports the allegations in
16 SENTENCE 24.

17 491. WHEN did Armstrong allegedly "reveal[] in his own words
18 on videotape" his alleged goal "to overthrow existing Church
19 management and to set up in its place a new set of Church
20 executives who would settle all of the civil damages suits brought
21 against the Church by the attorneys representing Armstrong?"

22 492. WHERE did Armstrong allegedly "reveal[] in his own words
23 on videotape" his alleged goal "to overthrow existing Church
24 management and to set up in its place a new set of Church
25 executives who would settle all of the civil damages suits brought
26 against the Church by the attorneys representing Armstrong?"

27 493. IDENTIFY each person to whom Armstrong allegedly
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1 "revealed in his own words on videotape" his alleged goal "to
2 overthrow existing Church management and to set up in its place a
3 new set of Church executives who would settle all of the civil
4 damages suits brought against the Church by the attorneys
5 representing Armstrong."

6 494. IDENTIFY WHERE the original videotape recording referred
7 to in SENTENCE 24, and all copies thereof, are located.

8 495. IDENTIFY each person who was involved in any way in the
9 making of the videotape recording referred to in SENTENCE 24, and
10 all copies thereof.

11 496. For each person IDENTIFIED in your answer to the
12 preceding question DESCRIBE his or her participation in any way in
13 the making of said videotape recording and copies.

14 497. IDENTIFY each person who approved the making of the
15 videotape recording referred to in SENTENCE 24, and all copies
16 thereof.

17 498. IDENTIFY each sum of money in wages, fees, bribes or
18 reimbursement paid to anyone at any time for anything done in
19 connection with or relating in any way to the making of the
20 videotape recording referred to in SENTENCE 24, and all copies
21 thereof.

22 499. IDENTIFY the location of the records which reflect the
23 financial expenditures and/or costs IDENTIFIED in your answer to
24 the preceding question.

25 500. Were any copies or portions of copies of the videotape
26 referred to in SENTENCE 24 at any time edited or altered in any
27 way whatsoever?

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1 501. If your answer to the preceding question is "yes,"
2 DESCRIBE each instance of such editing or altering.

3 502. If your answer to 500 above is "yes," IDENTIFY each
4 person who participated in any way in such editing or altering.

5 503. IDENTIFY each sum of money in wages, fees, bribes or
6 reimbursement paid to anyone at any time for anything done in
7 connection with or relating in any way to the editing or altering
8 of the videotape recording referred to in SENTENCE 24, and all
9 copies thereof.

10 504. IDENTIFY the location of the records which reflect the
11 financial expenditures and/or costs IDENTIFIED in your answer to
12 the preceding question.

13 505. Was any audio recording made of Armstrong allegedly
14 revealing his alleged goal "to overthrow existing Church
15 management and to set up in its place a new set of Church
16 executives who would settle all of the civil damages suits brought
17 against the Church by the attorneys representing Armstrong?"

18 506. If your answer to the preceding question is "yes,"
19 IDENTIFY WHERE such audio recording, and all copies thereof, are
20 located.

21 507. If your answer to 505 above is "yes," IDENTIFY each
22 person who was involved in any way in the making of said audio
23 recording.

24 508. For each person IDENTIFIED in your answer to the
25 preceding question DESCRIBE his or her participation in any way in
26 the making of said audio recording.

27 509. If your answer to 505 above is "yes," IDENTIFY each
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1 person who approved the making of said audio recording.

2 510. IDENTIFY each sum of money in wages, fees, bribes or
3 reimbursement paid to anyone at any time for anything done in
4 connection with or relating in any way to the making of any audio
5 recording of Armstrong allegedly revealing his alleged goal "to
6 overthrow existing Church management and to set up in its place a
7 new set of Church executives who would settle all of the civil
8 damages suits brought against the Church by the attorneys
9 representing Armstrong."

10 511. IDENTIFY the location of the records which reflect the
11 financial expenditures and/or costs IDENTIFIED in your answer to
12 the preceding question.

13 512. Prior to or after the time or times when Armstrong
14 allegedly "revealed in his own words on videotape" his alleged
15 goal "to overthrow existing Church management and to set up in its
16 place a new set of Church executives who would settle all of the
17 civil damages suits brought against the Church by the attorneys
18 representing Armstrong," was the person or persons IDENTIFIED in
19 your answer to 493 above given any ORDER or COMMUNICATION of any
20 kind or nature whatsoever by anyone connected to the "Church"
21 which mentioned, concerned or related in any way to Armstrong?

22 513. If your answer to the preceding question is "yes,"
23 IDENTIFY each such ORDER or COMMUNICATION.

24 514. If your answer to 512 above is "yes," IDENTIFY where
25 each such ORDER was given.

26 515. IDENTIFY each person who approved each ORDER or
27 COMMUNICATION IDENTIFIED in your answer to 513 above.

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1 516. Did the person or persons IDENTIFIED in your answer to
2 493 above at any time make any REPORT of any kind or nature
3 whatsoever to anyone connected to the "Church" which mentioned,
4 concerned or related in any way to Armstrong?

5 517. If your answer to the preceding question is "yes,"
6 IDENTIFY each such REPORT.

7 518. IDENTIFY WHERE each such REPORT IDENTIFIED in your
8 answer to 517 was made.

9 519. State the exact words said by Armstrong and DESCRIBE the
10 exact actions taken by Armstrong which have been interpreted as
11 Armstrong "reveal[ing] in his own words on videotape" that his
12 goal "was to overthrow existing Church management and to set up in
13 its place a new set of Church executives who would settle all of
14 the civil damages suits brought against the Church by the
15 attorneys representing Armstrong;" as stated in SENTENCE 24.

16 520. IDENTIFY each of the "civil damages suits brought
17 against the Church by the attorneys representing Armstrong"
18 referred to in SENTENCE 24. In these interrogatories, IDENTIFYING
19 a lawsuit means IDENTIFY each party, name the Court in which the
20 suit was filed, and the case number.

21 521. IDENTIFY each of the civil damages suits IDENTIFIED in
22 your answer to the preceding question which has been settled.

23 522. For each of the civil damages suits IDENTIFIED in your
24 answer to the preceding question state WHEN it was settled.

25 523. For each of the civil damages suits IDENTIFIED in your
26 answer to 522 above does plaintiff herein or anyone in the
27 "church" contend that the conditions of settlement were unfair to
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1 "the Church?"

2 524. If your answer to the preceding question is "yes,"
3 IDENTIFY each entity or person in "the Church" who contends that
4 the conditions of settlement were unfair to "the Church."

5 525. For each entity or person IDENTIFIED in your answer to
6 the preceding question, state what it, he or she contends is
7 unfair about the conditions of settlement of each of the cases
8 IDENTIFIED in your answer to 522 above.

9 526. IDENTIFY each person in the "existing Church management"
10 referred to in SENTENCE 24 who Armstrong allegedly sought "to
11 overthrow" as stated in SENTENCE 24.

12 527. IDENTIFY each person Armstrong allegedly sought to set
13 in place as "a new set of Church executives," as stated in
14 SENTENCE 24.

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16 528. IDENTIFY each person, company, group, organization or
17 other entity to whom the videotape referred to in SENTENCE 24, or
18 any other videotape showing a likeness of Armstrong has been
19 disseminated by anyone connected to the "church" at any time.

20 529. IDENTIFY WHEN the videotape referred to in SENTENCE 24,
21 or any other videotape showing a likeness of Armstrong was
22 disseminated by anyone connected to the "church" to each person,
23 company, group, organization or other entity IDENTIFIED in your
24 answer to the preceding question.

25 530. For each time IDENTIFIED in your answer to the preceding
26 question, IDENTIFY each person connected to the "church" who
27 disseminated the videotape referred to in SENTENCE 24, or any

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1 other videotape showing a likeness of Armstrong.

2 531. IDENTIFY who wrote SENTENCE 25 (SENTENCE 25 refers to
3 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
4 200052 which states "His plans included wresting control of the
5 Church, planting forged incriminating documents in Church files,
6 to be discovered by a government raid, and blackmailing a senior
7 Scientologist executive through attempted sexual entrapment.")

8 532. State each fact on which you base the allegations in
9 SENTENCE 25.

10 533. IDENTIFY each DOCUMENT which supports the allegations in
11 SENTENCE 25.

12 534. WHEN did Armstrong allegedly communicate his alleged
13 plan of "blackmailing a senior Scientologist executive through
14 attempted sexual entrapment?"

15 535. WHERE did Armstrong allegedly communicate his alleged
16 plan of "blackmailing a senior Scientologist executive through
17 attempted sexual entrapment?"

18 536. IDENTIFY each person to whom Armstrong allegedly
19 communicated his alleged plan of "blackmailing a senior
20 Scientologist executive through attempted sexual entrapment?"

21 537. Was any videotape recording made of any meeting or time
22 in which Armstrong allegedly communicated his alleged plan of
23 "blackmailing a senior Scientologist executive through attempted
24 sexual entrapment?"

25 538. If your answer to the preceding question is "yes,"
26 IDENTIFY WHERE such original videotape recording, and all copies
27 thereof, are located.

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1 539. If your answer to 537 above is "yes," IDENTIFY each
2 person who was involved in any way in the making of said videotape
3 recording.

4 540. For each person IDENTIFIED in your answer to the
5 preceding question DESCRIBE his or her participation in any way in
6 the making of said videotape recording.

7 541. If your answer to 537 above is "yes," IDENTIFY each
8 person who approved the making of said videotape recording.

9 542. IDENTIFY each sum of money in wages, fees, bribes or
10 reimbursement paid to anyone at any time for anything done in
11 connection with or relating in any way to the making of any
12 videotape recording of or involving Armstrong.

13 543. IDENTIFY the location of the records which reflect the
14 financial expenditures and/or costs IDENTIFIED in your answer to
15 the preceding question.

16 544. If your answer to 537 above is "yes," were any copies or
17 portions of copies of said videotape edited or altered in any way
18 whatsoever?

19 545. If your answer to the preceding question is "yes,"
20 DESCRIBE each instance of such editing or altering.

21 546. If your answer to 544 above is "yes," IDENTIFY each
22 person who participated in any way in such editing or altering.

23 547. If your answer to 544 above is "yes," IDENTIFY each sum
24 of money in wages, fees, bribes or reimbursement paid to anyone at
25 any time for anything done in connection with or relating in any
26 way to the editing or altering of any such videotape recording.

27 548. IDENTIFY the location of the records which reflect the
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1 financial expenditures and/or costs IDENTIFIED in your answer to
2 the preceding question.

3 549. Was any audio recording made of any meeting or time in
4 which Armstrong allegedly communicated his alleged plan of
5 "blackmailing a senior Scientologist executive through attempted
6 sexual entrapment?"

7 550. If your answer to the preceding question is "yes,"
8 IDENTIFY WHERE such audio recording, and all copies thereof, are
9 located.

10 551. If your answer to 549 above is "yes," IDENTIFY each
11 person who was involved in any way in the making of said audio
12 recording.

13 552. For each person IDENTIFIED in your answer to the
14 preceding question DESCRIBE his or her participation in any way in
15 the making of said audio recording.

16 553. If your answer to 549 above is "yes," IDENTIFY each
17 person who approved the making of said audio recording.

18 554. If your answer to 549 above is "yes," IDENTIFY each sum
19 of money in wages, fees, bribes or reimbursement paid to anyone at
20 any time for anything done in connection with or relating in any
21 way to the making of such audio recording.

22 555. IDENTIFY the location of the records which reflect the
23 financial expenditures and/or costs IDENTIFIED in your answer to
24 the preceding question.

25 556. Prior to or after the time or times when Armstrong
26 allegedly communicated his alleged plan of "blackmailing a senior
27 Scientologist executive through attempted sexual entrapment," was
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1 the person or persons IDENTIFIED in your answer to question 536
2 given any ORDER or COMMUNICATION of any kind or nature whatsoever
3 by anyone connected to the "Church" which mentioned, concerned or
4 related in any way to Armstrong?

5 557. If your answer to the preceding question is "yes,"
6 IDENTIFY each such ORDER or COMMUNICATION.

7 558. If your answer to 556 above is "yes," IDENTIFY WHERE
8 each such ORDER or COMMUNICATION was given.

9 559. IDENTIFY each person who approved each ORDER or
10 COMMUNICATION IDENTIFIED in your answer to 557 above.

11 560. Did the person or persons IDENTIFIED in your answer to
12 question 536 at any time make any REPORT of any kind or nature
13 whatsoever to anyone connected to the "Church" which mentioned,
14 concerned or related in any way to Armstrong?

15 561. If your answer to the preceding question is "yes,"
16 IDENTIFY each such REPORT.

17 562. IDENTIFY WHERE each such REPORT IDENTIFIED in your
18 answer to the preceding question was made.

19 563. State the exact words said by Armstrong and DESCRIBE the
20 exact actions taken by Armstrong which have been interpreted as
21 Armstrong having or communicating a plan of "blackmailing a senior
22 Scientologist executive through attempted sexual entrapment," as
23 stated in SENTENCE 25.

24 564. IDENTIFY who wrote SENTENCE 26 (SENTENCE 26 refers to
25 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
26 200052 which states "In sum, Armstrong's plans consisted of:
27 Orchestrating a coup in which agents of Armstrong and the U.S.

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1 government would take control of the Church of Scientology from
2 its lawful management.")

3 565. State each fact on which you base the allegations in
4 SENTENCE 26.

5 566. IDENTIFY each DOCUMENT which supports the allegations in
6 SENTENCE 26.

7 567. WHEN did Armstrong allegedly communicate his alleged
8 plan of "orchestrating a coup in which agents of Armstrong and the
9 U.S. government would take control of the Church of Scientology
10 from its lawful management?"

11 568. WHERE did Armstrong allegedly communicate his alleged
12 plan of "orchestrating a coup in which agents of Armstrong and the
13 U.S. government would take control of the Church of Scientology
14 from its lawful management?"

15 569. IDENTIFY each person to whom Armstrong allegedly
16 communicated his alleged plan of "orchestrating a coup in which
17 agents of Armstrong and the U.S. government would take control of
18 the Church of Scientology from its lawful management."

19 570. Was any videotape recording made of any meeting or time
20 in which Armstrong allegedly communicated his alleged plan of
21 "orchestrating a coup in which agents of Armstrong and the U.S.
22 government would take control of the Church of Scientology from
23 its lawful management?"

24 571. If your answer to the preceding question is "yes,"
25 IDENTIFY WHERE such original videotape recording, and all copies
26 thereof, are located.

27 572. If your answer to 570 above is "yes," IDENTIFY each
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1 person who was involved in any way in the making of said videotape
2 recording.

3 573. For each person IDENTIFIED in your answer to the
4 preceding question DESCRIBE his or her participation in any way in
5 the making of said videotape recording.

6 574. If your answer to 570 above is "yes," IDENTIFY each
7 person who approved the making of said videotape recording.

8 575. If your answer to 570 above is "yes," IDENTIFY each sum
9 of money in wages, fees, bribes or reimbursement paid to anyone at
10 any time for anything done in connection with or relating in any
11 way to the making of said videotape recording.

12 576. IDENTIFY the location of the records which reflect the
13 financial expenditures and/or costs IDENTIFIED in your answer to
14 the preceding question.

15 577. If your answer to 570 above is "yes," were any copies or
16 portions of copies of said videotape edited or altered in any way
17 whatsoever?

18 578. If your answer to the preceding question is "yes,"
19 DESCRIBE each instance of such editing or altering.

20 579. If your answer to 577 above is "yes," IDENTIFY each
21 person who participated in any way in such editing or altering.

22 580. If your answer to 577 above is "yes," IDENTIFY each sum
23 of money in wages, fees, bribes or reimbursement paid to anyone at
24 any time for anything done in connection with or relating in any
25 way to the editing or altering of such videotape recording.

26 581. IDENTIFY the location of the records which reflect the
27 financial expenditures and/or costs IDENTIFIED in your answer to
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1 the preceding question.

2 582. Was any audio recording made of any meeting or time in
3 which Armstrong allegedly communicated his alleged plan of
4 "orchestrating a coup in which agents of Armstrong and the U.S.
5 government would take control of the Church of Scientology from
6 its lawful management?"

7 583. If your answer to the preceding question is "yes,"
8 IDENTIFY WHERE such audio recording, and all copies thereof, are
9 located.

10 584. If your answer to 582 above is "yes," IDENTIFY each
11 person who was involved in any way in the making of said audio
12 recording.

13 585. For each person IDENTIFIED in your answer to the
14 preceding question DESCRIBE his or her participation in any way in
15 the making of said audio recording.

16 586. If your answer to 582 above is "yes," IDENTIFY each
17 person who approved the making of said audio recording.

18 587. If your answer to 582 above is "yes," IDENTIFY each sum
19 of money in wages, fees, bribes or reimbursement paid to anyone at
20 any time for anything done in connection with or relating in any
21 way to the making of such audio recording.

22 588. IDENTIFY the location of the records which reflect the
23 financial expenditures and/or costs IDENTIFIED in your answer to
24 the preceding question.

25 589. Prior to or after the time or times IDENTIFIED in your
26 answer to 567 above when Armstrong allegedly communicated his
27 alleged plan of "orchestrating a coup in which agents of Armstrong
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1 and the U.S. government would take control of the Church of
2 Scientology from its lawful management," was the person or persons
3 IDENTIFIED in your answer to 569 above given any ORDER or
4 COMMUNICATION of any kind or nature whatsoever by anyone connected
5 to the "Church" which mentioned, concerned or related in any way
6 to Armstrong?

7 590. If your answer to the preceding question is "yes,"
8 IDENTIFY each such ORDER or COMMUNICATION.

9 591. IDENTIFY WHERE each such ORDER or COMMUNICATION
10 IDENTIFIED in your answer to the preceding question was given.

11 592. IDENTIFY each person who approved each ORDER or
12 COMMUNICATION IDENTIFIED in your answer to 590 above.

13 593. Did the person or persons IDENTIFIED in your answer to
14 569 above to whom Armstrong allegedly communicated his alleged
15 plan of "orchestrating a coup in which agents of Armstrong and the
16 U.S. government would take control of the Church of Scientology
17 from its lawful management," at any time make any REPORT of any
18 kind or nature whatsoever to anyone connected to the "Church"
19 which mentioned, concerned or related in any way to Armstrong?

20 594. If your answer to the preceding question is "yes,"
21 IDENTIFY each such REPORT.

22 595. If your answer to 593 above is "yes," IDENTIFY WHERE
23 each such REPORT was made.

24 596. State the exact words said by Armstrong and DESCRIBE the
25 exact actions taken by Armstrong which have been interpreted as
26 Armstrong having or communicating a plan of "orchestrating a coup
27 in which agents of Armstrong and the U.S. government would take
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1 control of the Church of Scientology from its lawful management,"
2 as stated in SENTENCE 26.

3 597. IDENTIFY each person who was part of the "Church's"
4 "lawful management" referred to in SENTENCE 26 at the time or
5 times Armstrong allegedly had or communicated a plan of
6 "orchestrating a coup in which agents of Armstrong and the U.S.
7 government would take control of the Church of Scientology from
8 its lawful management."

9 598. IDENTIFY each person who was part of the "agents of
10 Armstrong" referred to in SENTENCE 26 at the time or times
11 Armstrong allegedly had or communicated a plan of "orchestrating a
12 coup in which agents of Armstrong and the U.S. government would
13 take control of the Church of Scientology from its lawful
14 management."

15 599. IDENTIFY who wrote SENTENCE 27 (SENTENCE 27 refers to
16 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
17 200052 which states "In sum, Armstrong's plans consisted of:
18 suborning perjury in order to keep his conspiracy under cover.")

19 600. State each fact on which you base the allegations in
20 SENTENCE 27.

21 601. IDENTIFY each DOCUMENT which supports the allegations in
22 SENTENCE 27.

23 602. WHEN did Armstrong allegedly communicate his alleged
24 plan of "suborning perjury in ORDER to keep his conspiracy under
25 cover?"

26 603. WHERE did Armstrong allegedly communicate his alleged
27 plan of "suborning perjury in ORDER to keep his conspiracy under
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1 cover?"

2 604. IDENTIFY each person to whom Armstrong allegedly
3 communicated his alleged plan of "suborning perjury in ORDER to
4 keep his conspiracy under cover."

5 605. Was any videotape recording made of any meeting or time
6 in which Armstrong allegedly communicated his alleged plan of
7 "suborning perjury in ORDER to keep his conspiracy under cover?"

8 606. If your answer to the preceding question is "yes,"
9 IDENTIFY WHERE such original videotape recording, and all copies
10 thereof, are located.

11 607. If your answer to 605 above is "yes," IDENTIFY each
12 person who was involved in any way in the making of said videotape
13 recording.

14 608. For each person IDENTIFIED in your answer to the
15 preceding question DESCRIBE his or her participation in any way in
16 the making of said videotape recording.

17 609. If your answer to 605 above is "yes," IDENTIFY each
18 person who approved the making of said videotape recording.

19 610. If your answer to 605 above is "yes," IDENTIFY each sum
20 of money in wages, fees, bribes or reimbursement paid to anyone at
21 any time for anything done in connection with or relating in any
22 way to the making of said videotape recording.

23 611. IDENTIFY the location of the records which reflect the
24 financial expenditures and/or costs IDENTIFIED in your answer to
25 the preceding question.

26 612. If your answer to 605 above is "yes," were any copies or
27 portions of copies of said videotape edited or altered in any way

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1 whatsoever?

2 613. If your answer to the preceding question is "yes,"
3 DESCRIBE each instance of such editing or altering.

4 614. If your answer to 612 above is "yes," IDENTIFY each
5 person who participated in any way in such editing or altering.

6 615. If your answer to 612 above is "yes," IDENTIFY each sum
7 of money in wages, fees, bribes or reimbursement paid to anyone at
8 any time for anything done in connection with or relating in any
9 way to the editing or altering of such videotape.

10 616. IDENTIFY the location of the records which reflect the
11 financial expenditures and/or costs IDENTIFIED in your answer to
12 the preceding question.

13 617. Was any audio recording made of any meeting or time in
14 which Armstrong allegedly communicated his alleged plan of
15 "suborning perjury in order to keep his conspiracy under cover?"

16 618. If your answer to the preceding question is "yes,"
17 IDENTIFY WHERE such audio recording, and all copies thereof, are
18 located.

19 619. If your answer to 617 above is "yes," IDENTIFY each
20 person who was involved in any way in the making of said audio
21 recording.

22 620. For each person IDENTIFIED in your answer to the
23 preceding question DESCRIBE his or her participation in any way in
24 the making of said audio recording.

25 621. If your answer to 617 above is "yes," IDENTIFY each
26 person who approved the making of said audio recording.

27 622. If your answer to 617 above is "yes," IDENTIFY each sum
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1 of money in wages, fees, bribes or reimbursement paid to anyone at
2 any time for anything done in connection with or relating in any
3 way to the making of such audio recording.

4 623. IDENTIFY the location of the records which reflect the
5 financial expenditures and/or costs IDENTIFIED in your answer to
6 the preceding question.

7 624. Prior to or after the time or times when Armstrong
8 allegedly communicated his alleged plan of "suborning perjury in
9 order to keep his conspiracy under cover," was the person or
10 persons IDENTIFIED in your answer to 604 above given any ORDER or
11 COMMUNICATION of any kind or nature whatsoever by anyone connected
12 to the "Church" which mentioned, concerned or related in any way
13 to Armstrong?

14 625. If your answer to the preceding question is "yes,"
15 IDENTIFY each such ORDER or COMMUNICATION.

16 626. If your answer to 624 above is "yes," IDENTIFY WHERE
17 each such ORDER or COMMUNICATION was given.

18 627. If your answer to 624 above is "yes," IDENTIFY each
19 person who approved each such ORDER or COMMUNICATION.

20 628. Did the person or persons IDENTIFIED in your answer to
21 604 above at any time make any REPORT of any kind or nature
22 whatsoever to anyone connected to the "Church" which mentioned,
23 concerned or related in any way to Armstrong?

24 629. If your answer to the preceding question is "yes,"
25 IDENTIFY each such REPORT.

26 630. If your answer to 628 above is "yes," IDENTIFY WHERE
27 each such REPORT was made.

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1 631. State the exact words said by Armstrong and DESCRIBE the
2 exact actions taken by Armstrong which have been interpreted as
3 Armstrong having or communicating a plan of "suborning perjury in
4 order to keep his conspiracy under cover," as stated in SENTENCE
5 27.

6 632. IDENTIFY who wrote SENTENCE 28 (SENTENCE 28 refers to
7 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
8 200052 which states "In late summer or early fall of 1984,
9 Armstrong contacted Sherman and explained that he and his IRS
10 contacts had come up with a plan to create false documents and
11 plant these on Church premises, where they would be seized in a
12 CID raid.")

13 633. State each fact on which you base the allegations in
14 SENTENCE 28.

15 634. IDENTIFY each DOCUMENT which supports the allegations in
16 SENTENCE 28.

17 635. WHERE did Armstrong allegedly explain to Sherman that
18 "he and his IRS contacts had come up with a plan to create false
19 documents and plant these on Church premises, where they would be
20 seized in a CID raid?"

21 636. WHEN did Armstrong allegedly explain to Sherman that "he
22 and his IRS contacts had come up with a plan to create false
23 documents and plant these on Church premises, where they would be
24 seized in a CID raid?"

25 637. Was any videotape recording made of any meeting or time
26 in which Armstrong allegedly explained to Sherman that "he and his
27 IRS contacts had come up with a plan to create false documents and
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1 plant these on Church premises, where they would be seized in a
2 CID raid?"

3 638. If your answer to the preceding question is "yes,"
4 IDENTIFY WHERE such original videotape recording, and all copies
5 thereof, are located.

6 639. If your answer to 637 above is "yes," IDENTIFY each
7 person who was involved in any way in the making of said videotape
8 recording.

9 640. For each person IDENTIFIED in your answer to the
10 preceding question DESCRIBE his or her participation in any way in
11 the making of said videotape recording.

12 641. If your answer to 637 above is "yes," IDENTIFY each
13 person who approved the making of said videotape recording.

14 642. If your answer to 637 above is "yes," IDENTIFY each sum
15 of money in wages, fees, bribes or reimbursement paid to anyone at
16 any time for anything done in connection with or relating in any
17 way to the making of any videotape recording which related in any
18 way to Armstrong allegedly explaining to Sherman that "he and his
19 IRS contacts had come up with a plan to create false documents and
20 plant these on Church premises, where they would be seized in a
21 CID raid."

22 643. If your answer to 637 above is "yes," IDENTIFY the
23 location of the records which reflect the financial expenditures
24 and/or costs IDENTIFIED in your answer to the preceding question.

25 644. If your answer to 637 above is "yes," were any copies or
26 portions of copies of said videotape edited or altered in any way
27 whatsoever.

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1 645. If your answer to the preceding question is "yes,"
2 DESCRIBE each instance of such editing or altering.

3 646. If your answer to 644 above is "yes," IDENTIFY each
4 person who participated in any way in such editing or altering.

5 647. If your answer to 644 above is "yes," IDENTIFY each sum
6 of money in wages, fees, bribes or reimbursement paid to anyone at
7 any time for anything done in connection with or relating in any
8 way to the editing or altering of any such videotape recording.

9 648. IDENTIFY the location of the records which reflect the
10 financial expenditures and/or costs IDENTIFIED in your answer to
11 the preceding question.

12 649. IDENTIFY each person connected to the "church" to whom
13 Sherman allegedly REPORTED or communicated in writing, orally or
14 in any other form or manner that Armstrong had contacted him "and
15 explained that he and his IRS contacts had come up with a plan to
16 create false documents and plant these on Church premises, where
17 they would be seized in a CID raid."

18 650. For each person IDENTIFIED in your answer to the
19 preceding question, state WHEN Sherman allegedly REPORTED or
20 communicated that Armstrong had contacted him "and explained that
21 he and his IRS contacts had come up with a plan to create false
22 documents and plant these on Church premises, where they would be
23 seized in a CID raid."

24 651. For each time IDENTIFIED in your answer to the preceding
25 question, state WHERE Sherman allegedly REPORTED or communicated
26 that Armstrong had contacted him "and explained that he and his
27 IRS contacts had come up with a plan to create false documents and
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1 plant these on Church premises, where they would be seized in a
2 CID raid."

3 652. For each time IDENTIFIED in your answer to 649, IDENTIFY
4 each REPORT or COMMUNICATION from Sherman wherein he allegedly
5 communicated that Armstrong had contacted him "and explained that
6 he and his IRS contacts had come up with a plan to create false
7 documents and plant these on Church premises, where they would be
8 seized in a CID raid."

9 653. Was Sherman at any time ORDERED or COMMUNICATED to by
10 anyone connected to the "church" concerning or relating in any way
11 to his alleged communication that Armstrong had contacted him "and
12 explained that he and his IRS contacts had come up with a plan to
13 create false documents and plant these on Church premises, where
14 they would be seized in a CID raid?"

15 654. If your answer to the preceding question is "yes,"
16 IDENTIFY each such ORDER or COMMUNICATION.

17 655. For each ORDER or COMMUNICATION IDENTIFIED in your
18 answer to IDENTIFY each person who approved it.

19 656. IDENTIFY each REPORT or COMMUNICATION at any time by
20 anyone connected to the "church" to anyone else connected with the
21 "church" which mentioned, concerned or related in any way to the
22 allegation that "In late summer or early fall of 1984, Armstrong
23 contacted Sherman and explained that he and his IRS contacts had
24 come up with a plan to create false documents and plant these on
25 Church premises, where they would be seized in a CID raid."

26 657. IDENTIFY who wrote SENTENCE 29 (SENTENCE 29 refers to
27 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
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1 200052 which states "According to Armstrong the IRS agents wanted
2 the "Loyalists" to plant covert electronic bugs in Church
3 offices;" hereinafter "SENTENCE 29."

4 658. State each fact on which you base the allegations in
5 SENTENCE 29.

6 659. IDENTIFY each DOCUMENT which supports the allegations in
7 SENTENCE 29.

8 660. WHEN did Armstrong allegedly communicate that "the IRS
9 agents wanted the "Loyalists" to plant covert electronic bugs in
10 Church offices?"

11 661. WHERE did Armstrong allegedly communicate that "the IRS
12 agents wanted the "Loyalists" to plant covert electronic bugs in
13 Church offices?"

14 662. IDENTIFY each person to whom Armstrong allegedly
15 communicated that "the IRS agents wanted the "Loyalists" to plant
16 covert electronic bugs in Church offices."

17 663. Was any videotape recording made of any meeting or time
18 in which Armstrong allegedly communicated that "the IRS agents
19 wanted the "Loyalists" to plant covert electronic bugs in Church
20 offices?"

21 664. If your answer to the preceding question is "yes,"
22 IDENTIFY WHERE such original videotape recording, and all copies
23 thereof, are located.

24 665. If your answer to 663 above is "yes," IDENTIFY each
25 person who was involved in any way in the making of said videotape
26 recording.

27 666. For each person IDENTIFIED in your answer to the
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1 preceding question describe his or her participation in any way in
2 the making of said videotape recording.

3 667. If your answer to 663 above is "yes," IDENTIFY each
4 person who approved the making of said videotape recording.

5 668. If your answer to 663 above is "yes," IDENTIFY each sum
6 of money in wages, fees, bribes or reimbursement paid to anyone at
7 any time for anything done in connection with or relating in any
8 way to the making of any videotape recording of or involving
9 Armstrong allegedly communicating in any way or manner that "the
10 IRS agents wanted the "Loyalists" to plant covert electronic bugs
11 in Church offices."

12 669. If your answer to 663 above is "yes," IDENTIFY the
13 location of the records which reflect the financial expenditures
14 and/or costs IDENTIFIED in your answer to the preceding question.

15 670. If your answer to 663 above is "yes," were any copies or
16 portions of copies of said videotape recording edited or altered
17 in any way whatsoever?

18 671. If your answer to the preceding question is "yes,"
19 DESCRIBE each instance of such editing or altering.

20 672. If your answer to 670 above is "yes," IDENTIFY each
21 person who participated in any way in such editing or altering.

22 673. If your answer to 670 above is "yes," IDENTIFY each sum
23 of money in wages, fees, bribes or reimbursement paid to anyone at
24 any time for anything done in connection with or relating in any
25 way to the editing or altering of any such videotape recording.

26 674. IDENTIFY the location of the records which reflect the
27 financial expenditures and/or costs IDENTIFIED in your answer to
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1 the preceding question.

2 675. Was any audio recording made of any meeting or time in
3 which Armstrong allegedly communicated that "the IRS agents wanted
4 the "Loyalists" to plant covert electronic bugs in Church
5 offices?"

6 676. If your answer to the preceding question is "yes,"
7 IDENTIFY WHERE such audio recording, and all copies thereof, are
8 located.

9 677. If your answer to 675 above is "yes," IDENTIFY each
10 person who was involved in any way in the making of said audio
11 recording.

12 678. For each person IDENTIFIED in your answer to the
13 preceding question DESCRIBE his or her participation in any way in
14 the making of said audio recording.

15 679. If your answer to 675 above is "yes," IDENTIFY each
16 person who approved the making of said audio recording.

17 680. If your answer to 675 above is "yes," IDENTIFY each sum
18 of money in wages, fees, bribes or reimbursement paid to anyone at
19 any time for anything done in connection with or relating in any
20 way to the making of any audio recording of or involving Armstrong
21 allegedly communicating in any way or manner that "the IRS agents
22 wanted the "Loyalists" to plant covert electronic bugs in Church
23 offices."

24 681. IDENTIFY the location of the records which reflect the
25 financial expenditures and/or costs IDENTIFIED in your answer to
26 the preceding question.

27 682. Prior to or after the time or times IDENTIFIED in your
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1 answer to 660 above when Armstrong allegedly communicated that
2 "the IRS agents wanted the "Loyalists" to plant covert electronic
3 bugs in Church offices," was the person or persons IDENTIFIED in
4 your answer to 662 above given any ORDER or COMMUNICATION of any
5 kind or nature whatsoever by anyone connected to the "Church"
6 which mentioned, concerned or related in any way to Armstrong?

7 683. If your answer to the preceding question is "yes,"
8 IDENTIFY each such ORDER or COMMUNICATION.

9 684. If your answer to 682 above is "yes," IDENTIFY WHERE
10 each such ORDER was given.

11 685. If your answer to 682 above is "yes," IDENTIFY each
12 person who approved each such ORDER.

13 686. Did the person or persons IDENTIFIED in your answer to
14 662 above to whom Armstrong allegedly communicated that "the IRS
15 agents wanted the "Loyalists" to plant covert electronic bugs in
16 Church offices," at any time make any REPORT of any kind or nature
17 whatsoever to anyone connected to the "Church" which mentioned,
18 concerned or related in any way to Armstrong?

19 687. If your answer to the preceding question is "yes,"
20 IDENTIFY each such REPORT.

21 688. If your answer to 686 above is "yes," IDENTIFY WHERE
22 each such REPORT was made.

23 689. State the exact words said by Armstrong and DESCRIBE the
24 exact actions taken by Armstrong which have been interpreted as
25 Armstrong communicating that "the IRS agents wanted the
26 "Loyalists" to plant covert electronic bugs in Church offices;" as
27 stated in SENTENCE 29.

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1 690. IDENTIFY who wrote SENTENCE 30 (SENTENCE 30 refers to
2 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
3 200052 which states "Armstrong offered eavesdropping and special
4 photographic equipment.")

5 691. State each fact on which you base the allegations in
6 SENTENCE 30.

7 692. IDENTIFY each DOCUMENT which supports the allegations in
8 SENTENCE 30.

9 693. WHEN did Armstrong allegedly "offer[] eavesdropping and
10 special photographic equipment?"

11 694. WHERE did Armstrong allegedly "offer[] eavesdropping and
12 special photographic equipment?"

13 695. IDENTIFY each person considered by SENTENCE 30 to whom
14 Armstrong allegedly "offered eavesdropping and special
15 photographic equipment."

16 696. Was any videotape recording made of any meeting or time
17 in which Armstrong allegedly "offered eavesdropping and special
18 photographic equipment?"

19 697. If your answer to the preceding question is "yes,"
20 IDENTIFY WHERE such original videotape recording, and all copies
21 thereof, are located.

22 698. If your answer to 696 above is "yes," IDENTIFY each
23 person who was involved in any way in the making of said videotape
24 recording.

25 699. For each person IDENTIFIED in your answer to the
26 preceding question DESCRIBE his or her participation in any way in
27 the making of said videotape recording.

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1 700. If your answer to 696 above is "yes," IDENTIFY each
2 person who approved the making of said videotape recording.

3 701. If your answer to 696 above is "yes," IDENTIFY each sum
4 of money in wages, fees, bribes or reimbursement paid to anyone at
5 any time for anything done in connection with or relating in any
6 way to the making of said videotape recording.

7 702. IDENTIFY the location of the records which reflect the
8 financial expenditures and/or costs IDENTIFIED in your answer to
9 the preceding question.

10 703. If your answer to 696 above is "yes," were any copies or
11 portions of copies of said videotape edited or altered in any way
12 whatsoever.

13 704. If your answer to the preceding question is "yes,"
14 DESCRIBE each instance of such editing or altering.

15 705. If your answer to 703 above is "yes," IDENTIFY each
16 person who participated in any way in such editing or altering.

17 706. If your answer to 703 above is "yes," IDENTIFY each sum
18 of money in wages, fees, bribes or reimbursement paid to anyone at
19 any time for anything done in connection with or relating in any
20 way to the editing or altering of such videotape recording.

21 707. IDENTIFY the location of the records which reflect the
22 financial expenditures and/or costs IDENTIFIED in your answer to
23 the preceding question.

24 708. Was any audio recording made of any meeting or time in
25 which Armstrong allegedly "offered eavesdropping and special
26 photographic equipment?"

27 709. If your answer to the preceding question is "yes,"
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1 IDENTIFY WHERE such audio recording, and all copies thereof, are
2 located.

3 710. If your answer to 708 above is "yes," IDENTIFY each
4 person who was involved in any way in the making of said audio
5 recording.

6 711. For each person IDENTIFIED in your answer to the
7 preceding question DESCRIBE his or her participation in any way in
8 the making of said audio recording.

9 712. If your answer to 708 above is "yes," IDENTIFY each
10 person who approved the making of said audio recording.

11 713. If your answer to 708 above is "yes," IDENTIFY each sum
12 of money in wages, fees, bribes or reimbursement paid to anyone at
13 any time for anything done in connection with or relating in any
14 way to the making of any such audio recording.

15 714. IDENTIFY the location of the records which reflect the
16 financial expenditures and/or costs IDENTIFIED in your answer to
17 the preceding question.

18 715. Prior to or after the time or times IDENTIFIED in your
19 answer to 693 above when Armstrong allegedly "offered
20 eavesdropping and special photographic equipment?" were any of the
21 persons IDENTIFIED in your answer to 695 above given any ORDER or
22 COMMUNICATION of any kind or nature whatsoever by anyone connected
23 to the "Church" which mentioned, concerned or related in any way
24 to Armstrong?

25 716. If your answer to the preceding question is "yes,"
26 IDENTIFY each such ORDER or COMMUNICATION.

27 717. If your answer to 715 above is "yes," IDENTIFY WHERE
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1 each such ORDER or COMMUNICATION was given.

2 718. If your answer to 715 above is "yes," IDENTIFY each
3 person who approved each such ORDER or COMMUNICATION.

4 719. Did the person or persons IDENTIFIED in your answer to
5 695 above to whom Armstrong allegedly "offered eavesdropping and
6 special photographic equipment?" at any time make any REPORT of
7 any kind or nature whatsoever to anyone connected to the "Church"
8 which mentioned, concerned or related in any way to Armstrong?

9 720. If your answer to the preceding question is "yes,"
10 IDENTIFY each such REPORT.

11 721. If your answer to 719 above is "yes," IDENTIFY WHERE
12 each such REPORT was made.

13 722. State the exact words said by Armstrong and DESCRIBE the
14 exact actions taken by Armstrong which have been interpreted as
15 Armstrong "offer[ing] eavesdropping and special photographic
16 equipment," as stated in SENTENCE 30.

17 723. State precisely what each person IDENTIFIED in your
18 answer to 695 above said, wrote or communicated in any way to
19 Armstrong following each time he allegedly "offered eavesdropping
20 and special photographic equipment."

21 724. State precisely what each person IDENTIFIED in your
22 answer to 695 above said, wrote or communicated in any way to
23 Armstrong prior to each time he allegedly "offered eavesdropping
24 and special photographic equipment."

25 725. IDENTIFY who wrote SENTENCE 31 (SENTENCE 31 refers to
26 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
27 200052 which states "Armstrong informed "Joey" that the

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1 "Loyalists" would be placed in the federal witness protection
2 program and would receive tax-exempt status in exchange for
3 participating in the covert operation.")

4 726. State each fact on which you base the allegations in
5 SENTENCE 31.

6 727. IDENTIFY each DOCUMENT which supports the allegations in
7 SENTENCE 31.

8 728. WHEN did Armstrong allegedly inform "Joey," hereinafter
9 "David Kluge" or "Kluge," that the "Loyalists" ... would receive
10 tax-exempt status in exchange for participating in the covert
11 operation?"

12 729. WHERE did Armstrong allegedly inform Kluge that the
13 "Loyalists" ... would receive tax-exempt status in exchange for
14 participating in the covert operation?"

15 730. Was any videotape recording made of any meeting or time
16 in which Armstrong allegedly informed Kluge "that the "Loyalists"
17 ... would receive tax-exempt status in exchange for participating
18 in the covert operation?"

19 731. If your answer to the preceding question is "yes,"
20 IDENTIFY WHERE such original videotape recording, and all copies
21 thereof, are located.

22 732. If your answer to 730 above is "yes," IDENTIFY each
23 person who was involved in any way in the making of said videotape
24 recording.

25 733. For each person IDENTIFIED in your answer to the
26 preceding question DESCRIBE his or her participation in any way in
27 the making of said videotape recording.

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1 734. If your answer to 730 above is "yes," IDENTIFY each
2 person who approved the making of said videotape recording.

3 735. If your answer to 730 above is "yes," IDENTIFY each sum
4 of money in wages, fees, bribes or reimbursement paid to anyone at
5 any time for anything done in connection with or relating in any
6 way to the making of such videotape recording.

7 736. IDENTIFY the location of the records which reflect the
8 financial expenditures and/or costs IDENTIFIED in your answer to
9 the preceding question.

10 737. If your answer to 730 above is "yes," were any copies or
11 portions of copies of said videotape edited or altered in any way
12 whatsoever?

13 738. If your answer to the preceding question is "yes,"
14 DESCRIBE each instance of such editing or altering.

15 739. If your answer to 737 above is "yes," IDENTIFY each
16 person who participated in any way in such editing or altering.

17 740. If your answer to 737 above is "yes," IDENTIFY each sum
18 of money in wages, fees, bribes or reimbursement paid to anyone at
19 any time for anything done in connection with or relating in any
20 way to the editing or altering of such videotape recording,

21 741. IDENTIFY the location of the records which reflect the
22 financial expenditures and/or costs IDENTIFIED in your answer to
23 the preceding question.

24 742. Was any audio recording made of any meeting or time in
25 which Armstrong allegedly informed Kluge "that the "Loyalists" ...
26 would receive tax-exempt status in exchange for participating in
27 the covert operation?"

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1 743. If your answer to the preceding question is "yes,"
2 IDENTIFY WHERE such audio recording, and all copies thereof, are
3 located.

4 744. If your answer to 742 above is "yes," IDENTIFY each
5 person who was involved in any way in the making of said audio
6 recording.

7 745. For each person IDENTIFIED in your answer to the
8 preceding question DESCRIBE his or her participation in any way in
9 the making of said audio recording.

10 746. If your answer to 742 above is "yes," IDENTIFY each
11 person who approved the making of said audio recording.

12 747. If your answer to 742 above is "yes," IDENTIFY each sum
13 of money in wages, fees, bribes or reimbursement paid to anyone at
14 any time for anything done in connection with or relating in any
15 way to the making of such audio recording.

16 748. IDENTIFY the location of the records which reflect the
17 financial expenditures and/or costs IDENTIFIED in your answer to
18 the preceding question.

19 749. Prior to or after the time or times when Armstrong
20 allegedly informed Kluge "that the "Loyalists" ... would receive
21 tax-exempt status in exchange for participating in the covert
22 operation," was Kluge given any ORDER or COMMUNICATION of any kind
23 or nature whatsoever by anyone connected to the "Church" which
24 mentioned, concerned or related in any way to Armstrong?

25 750. If your answer to the preceding question is "yes,"
26 IDENTIFY each such ORDER or COMMUNICATION.

27 751. If your answer to 749 above is "yes," IDENTIFY WHERE
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1 each such ORDER was given.

2 752. If your answer to 749 above is "yes," IDENTIFY each
3 person who approved each such ORDER.

4 753. Prior to or after any time IDENTIFIED in your answer to
5 728 above when Armstrong allegedly informed Kluge "that the
6 "Loyalists" ... would receive tax-exempt status in exchange for
7 participating in the covert operation," did Kluge make any REPORT
8 or COMMUNICATION of any kind or nature whatsoever to anyone
9 connected to the "Church" which mentioned, concerned or related in
10 any way to Armstrong?

11 754. If your answer to 753 above is "yes," IDENTIFY each such
12 REPORT or COMMUNICATION.

13 755. If your answer to 753 above is "yes," IDENTIFY WHERE
14 each such REPORT was made.

15 756. State the exact words said by Armstrong and DESCRIBE the
16 exact actions taken by Armstrong which have been interpreted as
17 Armstrong informing Kluge "that the "Loyalists" ... would receive
18 tax-exempt status in exchange for participating in the covert
19 operation," as stated in SENTENCE 31.

20 757. State precisely what Kluge said, wrote or communicated
21 in any way to Armstrong following each time Armstrong allegedly
22 informed Kluge "that the "Loyalists" ... would receive tax-exempt
23 status in exchange for participating in the covert operation."

24 758. State precisely what Kluge said, wrote or communicated
25 in any way to Armstrong prior to each time he allegedly informed
26 Kluge "that the "Loyalists" ... would receive tax-exempt status in
27 exchange for participating in the covert operation."

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1 759. IDENTIFY who wrote SENTENCE 32 (SENTENCE 32 refers to
2 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
3 200052 which states "Armstrong instructed Joey how to lie under
4 oath about their plans to disrupt Church management.")

5 760. State each fact on which you base the allegations in
6 SENTENCE 32.

7 761. IDENTIFY each DOCUMENT which supports the allegations in
8 SENTENCE 32.

9 762. WHEN did Armstrong allegedly instruct Kluge "how to lie
10 under oath about their plans to disrupt Church management?"

11 763. WHERE did Armstrong allegedly instruct Kluge "how to lie
12 under oath about their plans to disrupt Church management?"

13 764. Was any videotape recording made of any meeting or time
14 in which Armstrong allegedly instructed Kluge "how to lie under
15 oath about their plans to disrupt Church management?"

16 765. If your answer to the preceding question is "yes,"
17 IDENTIFY WHERE such original videotape recording, and all copies
18 thereof, are located.

19 766. If your answer to 764 above is "yes," IDENTIFY each
20 person who was involved in any way in the making of said videotape
21 recording.

22 767. For each person IDENTIFIED in your answer to the
23 preceding question DESCRIBE his or her participation in any way in
24 the making of said videotape recording.

25 768. If your answer to 765 above is "yes," IDENTIFY each
26 person who approved the making of said videotape recording.

27 769. If your answer to 765 above is "yes," IDENTIFY each sum
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1 of money in wages, fees, bribes or reimbursement paid to anyone at
2 any time for anything done in connection with or relating in any
3 way to the making of said videotape recording.

4 770. IDENTIFY the location of the records which reflect the
5 financial expenditures and/or costs IDENTIFIED in your answer to
6 the preceding question.

7 771. If your answer to 765 above is "yes," were any copies or
8 portions of copies of said videotape edited or altered in any way
9 whatsoever?

10 772. If your answer to the preceding question is "yes,"
11 DESCRIBE each instance of such editing or altering.

12 773. If your answer to 771 above is "yes," IDENTIFY each
13 person who participated in any way in such editing or altering.

14 774. If your answer to 771 above is "yes," IDENTIFY each sum
15 of money in wages, fees, bribes or reimbursement paid to anyone at
16 any time for anything done in connection with or relating in any
17 way to the editing or altering of such videotape recording.

18 775. IDENTIFY the location of the records which reflect the
19 financial expenditures and/or costs IDENTIFIED in your answer to
20 the preceding question.

21 776. Was any audio recording made of any meeting or time in
22 which Armstrong allegedly instructed Kluge "how to lie under oath
23 about their plans to disrupt Church management?"

24 777. If your answer to the preceding question is "yes,"
25 IDENTIFY WHERE such audio recording, and all copies thereof, are
26 located.

27 778. If your answer to 776 above is "yes," IDENTIFY each
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1 person who was involved in any way in the making of said audio
2 recording.

3 779. For each person IDENTIFIED in your answer to the
4 preceding question DESCRIBE his or her participation in any way in
5 the making of said audio recording.

6 780. If your answer to 776 above is "yes," IDENTIFY each
7 person who approved the making of said audio recording.

8 781. If your answer to 776 above is "yes," IDENTIFY each sum
9 of money in wages, fees or reimbursement paid to anyone at any
10 time for anything done in connection with or relating in any way
11 to the making of said audio recording. -

12 782. IDENTIFY the location of the records which reflect the
13 financial expenditures and/or costs IDENTIFIED in your answer to
14 the preceding question.

15 783. Prior to or after the time or times when Armstrong
16 allegedly instructed Kluge "how to lie under oath about their
17 plans to disrupt Church management" was Kluge given any ORDER or
18 COMMUNICATION of any kind or nature whatsoever by anyone connected
19 to the "Church" which mentioned, concerned or related in any way
20 to Armstrong?

21 784. If your answer to the preceding question is "yes,"
22 IDENTIFY each such ORDER or COMMUNICATION.

23 785. If your answer to 783 above is "yes," IDENTIFY WHERE
24 each such ORDER was given.

25 786. If your answer to 783 above is "yes," IDENTIFY each
26 person who approved each such ORDER.

27 787. Prior to or after any time identified in your answer to
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1 762 above when Armstrong allegedly instructed Kluge "how to lie
2 under oath about their plans to disrupt Church management," did
3 Kluge make any REPORT of any kind or nature whatsoever to anyone
4 connected to the "Church" which mentioned, concerned or related in
5 any way to Armstrong?

6 788. If your answer to the preceding question is "yes,"
7 IDENTIFY each such REPORT.

8 789. If your answer to 787 above is "yes," IDENTIFY WHERE
9 each such REPORT was made.

10 790. State the exact words said by Armstrong and DESCRIBE the
11 exact actions taken by Armstrong which have been interpreted as
12 Armstrong instructing Kluge "how to lie under oath about their
13 plans to disrupt Church management," as stated in SENTENCE 32.

14 791. State precisely what Kluge said, wrote or communicated
15 in any way to Armstrong following each time Armstrong allegedly
16 instructed Kluge "how to lie under oath about their plans to
17 disrupt Church management."

18 792. State precisely what Kluge said, wrote or communicated
19 in any way to Armstrong prior to each time Armstrong allegedly
20 instructed Kluge "how to lie under oath about their plans to
21 disrupt Church management."

22 793. DESCRIBE Armstrong's and Kluge's alleged "plans to
23 disrupt Church management," as stated in SENTENCE 32. In this
24 interrogatory DESCRIBE means state each separate action or part of
25 the "plans;" state which of the actions or parts of the "plans"
26 were originated by Kluge, which by Armstrong, and which were
27 originated by someone else; IDENTIFY each person in "Church
28

1 762 above when Armstrong allegedly instructed Kluge "how to lie
2 under oath about their plans to disrupt Church management," did
3 Kluge make any REPORT of any kind or nature whatsoever to anyone
4 connected to the "Church" which mentioned, concerned or related in
5 any way to Armstrong?

6 788. If your answer to the preceding question is "yes,"
7 IDENTIFY each such REPORT.

8 789. If your answer to 787 above is "yes," IDENTIFY WHERE
9 each such REPORT was made.

10 790. State the exact words said by Armstrong and DESCRIBE the
11 exact actions taken by Armstrong which have been interpreted as
12 Armstrong instructing Kluge "how to lie under oath about their
13 plans to disrupt Church management," as stated in SENTENCE 32.

14 791. State precisely what Kluge said, wrote or communicated
15 in any way to Armstrong following each time Armstrong allegedly
16 instructed Kluge "how to lie under oath about their plans to
17 disrupt Church management."

18 792. State precisely what Kluge said, wrote or communicated
19 in any way to Armstrong prior to each time Armstrong allegedly
20 instructed Kluge "how to lie under oath about their plans to
21 disrupt Church management."

22 793. DESCRIBE Armstrong's and Kluge's alleged "plans to
23 disrupt Church management," as stated in SENTENCE 32. In this
24 interrogatory DESCRIBE means state each separate action or part of
25 the "plans;" state which of the actions or parts of the "plans"
26 were originated by Kluge, which by Armstrong, and which were
27 originated by someone else; IDENTIFY each person in "Church
28

1 management" and each person involved in the "plans" in any way
2 whatsoever; state what roll, part or action each IDENTIFIED person
3 would have in the "plans;" state how each of the actions or parts
4 of the "plans" would disrupt said "management;" and state what
5 said "management" would be doing if left undisrupted.

6 794. IDENTIFY who wrote SENTENCE 33 (SENTENCE 33 refers to
7 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
8 200052 which states "Armstrong wanted "Joey," if deposed, to say
9 that he and Armstrong had merely discussed a "global settlement"
10 of Church litigation.")

11 795. State each fact on which you base the allegations in
12 SENTENCE 33.

13 796. IDENTIFY each DOCUMENT which supports the allegations
14 in SENTENCE 33.

15 797. Did such a "global settlement" occur?

16 798. If your answer to the preceding question is "yes,"
17 DESCRIBE all of Gerald Armstrong's actions known to you which
18 contributed to, participated in, or related in any way to such
19 "global settlement."

20 799. If your answer to 797 above is "yes," IDENTIFY each
21 person who participated in any way in said "global settlement."

22 800. For each person IDENTIFIED in your answer to the
23 preceding question, state precisely what he or she did to
24 contribute to, participate in, benefit from, or in relation to
25 said "global settlement."

26 801. If your answer to 797 above is "yes," are you
27 dissatisfied with any of your benefits or anything else in or
28

1 pursuant to such "global settlement?"

2 802. If your answer to the preceding question is "yes,"
3 DESCRIBE each such dissatisfaction. In this interrogatory,
4 DESCRIBE means in plain English IDENTIFY each real benefit you
5 received in or pursuant to such "global settlement" and each
6 hoped-for benefit not received in or pursuant to such "global
7 settlement;" IDENTIFY which of the benefits received turned out to
8 be something less satisfying than what you originally imagined it
9 was, and in what way; IDENTIFY the form of your dissatisfaction,
10 when such condition started, and each action you have taken to
11 alleviate, reduce or eliminate such dissatisfaction.

12 803. IDENTIFY who wrote SENTENCE 34 (SENTENCE 34 refers to
13 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
14 200053 which states "During one meeting with "Joey," Armstrong's
15 alleged claim that he "feared" Church retaliation was revealed as
16 a complete falsehood.")

17 804. State each fact on which you base the allegations in
18 SENTENCE 34.

19 805. IDENTIFY each DOCUMENT which supports the allegations in
20 SENTENCE 34.

21 806. Regarding "Armstrong's alleged claim that he "feared"
22 Church retaliation," WHEN did Armstrong first make such "alleged
23 claim?"

24 807. Regarding "Armstrong's alleged claim that he "feared"
25 Church retaliation," WHERE did Armstrong first make such "alleged
26 claim?"

27 808. Regarding "Armstrong's alleged claim that he "feared"
28

1 Church retaliation," when Armstrong made such "alleged claim" what
2 date or time period was he referring to or considering as being
3 the time when he actually had "feared Church retaliation?"

4 809. What was the date of the meeting with Kluge WHEN
5 allegedly "Armstrong's alleged claim that he "feared" Church
6 retaliation was revealed as a complete falsehood?"

7 810. Define your term "complete falsehood."

8 811. Do you contend that fear can ever be real?

9 812. If your answer to the preceding question is "yes," state
10 each fact on which you base said contention.

11 813. Do you contend that people cannot change through time?

12 814. If your answer to the preceding question is "yes," state
13 each fact on which you base said contention.

14 815. IDENTIFY each person who has ever been subjected to
15 "Church retaliation." In this interrogatory "Church retaliation"
16 includes, but is not limited to: being declared a suppressive
17 person; having a file opened on him or her by any Sea Organization
18 unit or member, any Guardian's Office unit or member, any Office
19 of Special Affairs unit or member, or any Scientology-hired
20 private investigator or private investigation firm; being
21 investigated by any Sea Organization unit or member, any
22 Guardian's Office unit or member, any Office of Special Affairs
23 unit or member, or any Scientology-hired private investigator or
24 private investigation firm; having his or her telephones tapped,
25 his quarters bugged or his conversations recorded by any Sea
26 Organization unit or member, any Guardian's Office unit or member,
27 any Office of Special Affairs unit or member, or any Scientology-

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1 hired private investigator or private investigation firm; having
2 any of his or her possessions stolen by any Scientology-related
3 person, agent or entity; being black-PRed by any Scientology-
4 related person, agent, entity or organization; being sued by any
5 Scientology-related organization, corporation or individual; being
6 lied to or about by any member of Scientology or its agents;
7 having his or her preclear files or folders and auditing reports
8 given to any "ethics" personnel, Sea Organization unit, any
9 Guardian's Office unit or member, any Office of Special Affairs
10 unit or member, or any Scientology-hired private investigator or
11 private investigation firm; being harassed in any way by any Sea
12 Organization unit or member, any Guardian's Office unit or member,
13 any Office of Special Affairs unit or member, or any Scientology-
14 hired private investigator or private investigation firm; having
15 his or her family, friends or associates harassed in any way by
16 any Sea Organization unit or member, any Guardian's Office unit or
17 member, any Office of Special Affairs unit or member, or any
18 Scientology-hired private investigator or private investigation
19 firm; being cheated in any way by any Sea Organization unit or
20 member, any Guardian's Office unit or member, any Office of
21 Special Affairs unit or member, or any Scientology-hired private
22 investigator or private investigation firm; being assaulted by any
23 Sea Organization member, any Guardian's Office member, any Office
24 of Special Affairs member, or any Scientology-hired private
25 investigator.

26 816. DESCRIBE what retaliation each person IDENTIFIED in your
27 answer to the preceding question was subjected to at any time. In
28

1 this interrogatory DESCRIBE means IDENTIFY the date of each
2 instance of retaliation by the "church," state was done to him or
3 her, as per the various acts of retaliation listed in the
4 preceding question, and IDENTIFY the "church" perpetrators of such
5 instance of retaliation.

6 817. IDENTIFY who wrote SENTENCE 35 (SENTENCE 35 refers to
7 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
8 200053 which states "New evidence of Armstrong's fraudulent
9 intentions was revealed in a declaration of November 18, 1991, in
10 which he admitted that he never intended to stick to the terms of
11 the settlement agreement he signed with the Church in 1986.")

12 818. State each fact on which you base the allegations in
13 SENTENCE 35.

14 819. IDENTIFY each DOCUMENT which supports the allegations
15 in SENTENCE 35.

16 820. Was Armstrong's declaration of November 18, 1991 ever
17 sealed in the case of Church of Scientology of California v.
18 Armstrong, Los Angeles Superior Court Case No. C 420153,
19 hereinafter Armstrong I?

20 821. If your answer to the preceding question is "yes," was
21 such declaration ever unsealed?

22 822. If your answer to the preceding question is "yes," WHEN
23 was such declaration unsealed?

24 823. If your answer to 820 above is "yes," who ordered such
25 declaration unsealed?

26 824. IDENTIFY each page, paragraph and line number of
27 Armstrong's declaration of November 18, 1991 whereat he allegedly
28

28

1 "admitted that he never intended to stick to the terms of the
2 settlement agreement."

3 825. IDENTIFY who wrote SENTENCE 36 (SENTENCE 36 refers to
4 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
5 200053 which states "In his declaration, Armstrong asserted that
6 he had read and understood the settlement agreement, but that he
7 "put on a happy face" and went through the charade of signing it
8 even though he told his lawyers that he never intended to abide by
9 its terms.")

10 826. State each fact on which you base the allegations in
11 SENTENCE 36.

12 827. IDENTIFY each DOCUMENT which supports the allegations
13 in SENTENCE 36.

14 828. IDENTIFY each page, paragraph and line number of
15 Armstrong's declaration of November 18, 1991 whereat he allegedly
16 asserted that he "went through the charade of signing [the
17 settlement agreement] even though he told his lawyers that he
18 never intended to abide by its terms."

19 829. IDENTIFY who wrote SENTENCE 37 (SENTENCE 37 refers to
20 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
21 200053 which states "Armstrong's stated reason for signing the
22 agreement in the full knowledge that he would violate it later is
23 so that he could receive the "financial wherewithal" to "get on
24 with the next phase of [his] life.")

25 830. State each fact on which you base the allegations in
26 SENTENCE 37.

27 831. IDENTIFY each DOCUMENT which supports the allegations
28

1 in SENTENCE 37.

2 832. IDENTIFY each page, paragraph and line number of
3 Armstrong's declaration of November 18, 1991 whereat he allegedly
4 stated that his "reason for signing the agreement in the full
5 knowledge that he would violate it later is so that he could
6 receive the "financial wherewithal" to "get on with the next phase
7 of [his] life."

8 833. In Armstrong's declaration of November 18, 1991 did he
9 state any other reason for signing the agreement in addition to
10 "so that he could receive the "financial wherewithal" to "get on
11 with the next phase of [his] life?"

12 834. If your answer to the preceding question is "yes,"
13 state precisely each such other reason stated by Armstrong.

14 835. IDENTIFY who wrote SENTENCE 38 (SENTENCE 38 refers to
15 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
16 200053 which states "Armstrong's motives were money and power.")

17 836. State each fact on which you base the allegations in
18 SENTENCE 38.

19 837. IDENTIFY each DOCUMENT which supports the allegations
20 in SENTENCE 38.

21 838. At what time or during what period were Armstrong's
22 motives allegedly "money and power," as considered by and in
23 SENTENCE 38?

24 839. IDENTIFY who wrote SENTENCE 39 (SENTENCE 39 refers to
25 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
26 200054 which states "This is also shown by a letter to attorney
27 Eric Lieberman on June 21, 1991.")

28

1 840. State each fact on which you base the allegations in
2 SENTENCE 39.

3 841. IDENTIFY each DOCUMENT which supports the allegations
4 in SENTENCE 39.

5 842. IDENTIFY each page, paragraph and line in Armstrong's
6 "letter to attorney Eric Lieberman on June 21, 1991" whereat it is
7 shown that "Armstrong's motives were money and power," as stated
8 in Sentences 38 and 39.

9 843. IDENTIFY who wrote SENTENCE 40 (SENTENCE 40 refers to
10 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
11 200054 which states "The Court's decision upheld that of the lower
12 court, but stated that Breckenridge's negative comments about the
13 Church were to be taken to indicate Armstrong's state of mind at
14 the time he stole the documents, and not for their truth.")

15 844. State each fact on which you base the allegations in
16 SENTENCE 40.

17 845. IDENTIFY each DOCUMENT which supports the allegations
18 in SENTENCE 40.

19 846. IDENTIFY by page number where the Court of Appeal
20 decision upholding the Breckenridge decision stated that Armstrong
21 stole any documents.

22 847. IDENTIFY by page number where the Court of Appeal
23 decision upholding the Breckenridge decision stated "that
24 Breckenridge's negative comments about the Church were to be taken
25 to indicate Armstrong's state of mind at the time he stole the
26 documents."

27 848. IDENTIFY who wrote SENTENCE 41 (SENTENCE 41 refers to
28

1 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
2 200054 which states "Armstrong's state of mind is illustrated by
3 various "literary" writings authored by him, none of which more
4 clearly demonstrated it than a document now known as the "pig
5 letter," in which Armstrong purported to describe a dream.")

6 849. State each fact on which you base the allegations in
7 SENTENCE 41.

8 850. IDENTIFY each DOCUMENT which supports the allegations
9 in SENTENCE 41.

10 851. Was the "pig letter" ever sealed in the Armstrong I
11 case?

12 852. If your answer to the preceding question is "yes," WHEN
13 was such letter sealed?

14 853. If your answer to 851 above is "yes," was such letter
15 ever unsealed?

16 854. If your answer to the preceding question is "yes," WHEN
17 was such letter unsealed?

18 855. If your answer to 853 above is "yes," who ordered such
19 letter unsealed?

20 856. DESCRIBE what you claim is Armstrong's state of mind
21 which is allegedly demonstrated by the "pig letter" more clearly
22 than by any other of the "various "literary" writings authored by"
23 Armstrong, as stated in SENTENCE 41.

24 857. DESCRIBE how the "pig letter" came into your
25 possession. In this interrogatory, "DESCRIBE" means state in
26 plain English WHEN you received it, IDENTIFY from whom you
27 received it, IDENTIFY the person or persons in your organization

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1 who received it, IDENTIFY each person who did anything of any
2 nature whatsoever in connection with its obtaining and what each
3 IDENTIFIED person did in connection with its obtaining, and DETAIL
4 all actions relating in any way or manner whatsoever to Armstrong
5 taken by all your personnel or agents prior to obtaining said
6 "letter."

7 858. IDENTIFY each person, company, group, organization or
8 other entity to whom the "pig letter" has been disseminated by
9 anyone connected to the "church" at any time.

10 859. WHEN was the "pig letter" disseminated to each of the
11 persons, companies, groups, organizations or other entities
12 IDENTIFIED in your answer to the preceding question?

13 860. IDENTIFY each person who disseminated the "pig letter"
14 to each of the persons, companies, groups, organizations or other
15 entities, IDENTIFIED in your answer to 858 above.

16 861. IDENTIFY each person who ORDERED the dissemination of
17 the "pig letter" to each of the persons, companies, groups,
18 organizations or other entities IDENTIFIED in your answer to 858
19 above.

20 862. IDENTIFY each administration or management policy of
21 any Scientology which was followed by each person who carried out
22 and in the course of carrying out the dissemination of the "pig
23 letter."

24 863. IDENTIFY all financial costs or expenditures related in
25 any way to the dissemination of the "pig letter."

26 864. IDENTIFY each sum of money that each person who
27 participated in any way in the dissemination of the "pig letter"

28

1 was paid at any time for his or her participation in said
2 dissemination. (Pro rate as reasonable.)

3 865. Do you have Armstrong's permission to publish or
4 disseminate the "pig letter?"

5 866. If your answer to the preceding question is "no," have
6 you applied to Armstrong for permission to publish or disseminate
7 the "pig letter?"

8 867. IDENTIFY who wrote SENTENCE 42 (SENTENCE 42 refers to
9 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
10 200054 which states "All the documents Armstrong stole have now
11 been returned to the Church.")

12 868. State each fact on which you base the allegations in
13 SENTENCE 42.

14 869. IDENTIFY each DOCUMENT which supports the allegations
15 in SENTENCE 42.

16 870. IDENTIFY each DOCUMENT Armstrong allegedly "stole."

17 871. For each DOCUMENT IDENTIFIED in your answer to the
18 preceding question, IDENTIFY the date or time period WHEN
19 Armstrong allegedly "stole" it.

20 872. IDENTIFY each DOCUMENT which Armstrong allegedly
21 "returned to the Church."

22 873. IDENTIFY who wrote SENTENCE 43 (SENTENCE 43 refers to
23 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
24 200054 which states "During the trial in 1984 Armstrong made
25 numerous false allegations about L. Ron Hubbard, pretending to the
26 judge that while in the Church, he had thoroughly researched Mr.
27 Hubbard's life.")

28

1 874. State each fact on which you base the allegations in
2 SENTENCE 43.

3 875. IDENTIFY each DOCUMENT which supports the allegations
4 in SENTENCE 43.

5 876. IDENTIFY each of the "numerous false allegations about
6 L. Ron Hubbard" Armstrong allegedly made during the trial in 1984.
7 In this interrogatory, "IDENTIFY" means state exactly what
8 Armstrong said, and the page and line numbers in the trial
9 transcript WHERE you claim he made each such alleged "false
10 allegation."

11 877. For each allegedly "false allegation" IDENTIFIED in your
12 answer to the preceeding question, state what you contend is the
13 truth about L. Ron Hubbard underlying such allegedly "false
14 allegation."

15 878. IDENTIFY by page and line numbers in the trial
16 transcript where Armstrong allegedly pretended "to the judge that
17 while in the Church, he had thoroughly researched Mr. Hubbard's
18 life."

19 879. IDENTIFY who wrote SENTENCE 44 (SENTENCE 44 refers to
20 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
21 200054 which states "However, Armstrong's incompetence as a
22 researcher is well documented.")

23 880. State each fact on which you base the allegations in
24 SENTENCE 44.

25 881. IDENTIFY each DOCUMENT which supports the allegations
26 in SENTENCE 44.

27 882. IDENTIFY who wrote SENTENCE 45 (SENTENCE 45 refers to
28

1 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
2 200056 which states "Mr. Hubbard's achievements completely belie
3 Armstrong's allegations.")

4 883. State each fact on which you base the allegations in
5 SENTENCE 45.

6 884. IDENTIFY each DOCUMENT which supports the allegations
7 in SENTENCE 45.

8 885. IDENTIFY each of Armstrong's allegations which are
9 allegedly belied by Hubbard's alleged achievements. In this
10 interrogatory, "IDENTIFY" means state exactly what Armstrong said,
11 the page and line numbers in the trial transcript, or any other
12 location WHERE you claim he made each such alleged "allegation,"
13 and WHEN he made each such alleged "allegation."

14 886. For each of Armstrong's allegations described in your
15 answer to 1097 IDENTIFY what alleged achievement or achievements
16 by Hubbard belie it. In this interrogatory, "IDENTIFY" means
17 state WHEN Hubbard achieved the achievement and in plain English
18 what it is.

19 887. WHEN was FREEDOM 1 (FREEDOM 1 refers to the DOCUMENT
20 entitled "Freedom Special Edition," dated April/May, 1985,
21 included as "Section 2" in DA DOC A in PLAINTIFF'S PRODUCTION and
22 Bates stamped with numbers 200059 through 200070) prepared?

23 888. WHERE was FREEDOM 1 prepared?

24 889. WHERE is the master or original of FREEDOM 1 located?

25 890. IDENTIFY each person who participated in any way in the
26 preparation of FREEDOM 1.

27 891. IDENTIFY each sum of money each person who participated
28

1 in any way in the preparation of FREEDOM 1 was paid at any time
2 for his or her participation in said preparation. (Pro rate as
3 reasonable.)

4 892. IDENTIFY the location of the records which reflect the
5 sums of money IDENTIFIED in your answer to the preceding question.

6 893. DESCRIBE what each of the persons IDENTIFIED in your
7 answer to 890 above did in preparing FREEDOM 1.

8 894. IDENTIFY who was in charge of the preparation of FREEDOM
9 1.

10 895. IDENTIFY who ORDERED the preparation of FREEDOM 1.

11 896. IDENTIFY each ORDER or COMMUNICATION which concerned or
12 related in any way to the preparation of FREEDOM 1.

13 897. IDENTIFY each person who approved the preparation of
14 FREEDOM 1.

15 898. WHEN did the person or persons IDENTIFIED in your
16 answer to 895 above ORDER the preparation of FREEDOM 1?

17 899. IDENTIFY each person, company, group, organization or
18 other entity to whom FREEDOM 1 has been disseminated by anyone at
19 any time.

20 900. IDENTIFY WHEN was FREEDOM 1 disseminated to each of the
21 persons, companies, groups, organizations or other entities
22 IDENTIFIED in your answer to the preceding question.

23 901. IDENTIFY each person who disseminated FREEDOM 1 to each
24 of the persons, companies, groups, organizations or other
25 entities, IDENTIFIED in your answer to 899 above.

26 902. IDENTIFY each person who ORDERED the dissemination of
27 FREEDOM 1 to each of the persons, companies, groups, organizations

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1 or other entities IDENTIFIED in your answer to 899 above.

2 903. IDENTIFY each administration or management policy of
3 Scientology which was followed by each person who carried out and
4 in the course of carrying out the preparation and dissemination of
5 FREEDOM 1.

6 904. IDENTIFY all financial costs in the preparation and
7 dissemination of FREEDOM 1.

8 905. IDENTIFY each sum of money that each person who
9 participated in any way in the dissemination of FREEDOM 1 was paid
10 at any time for his or her participation in said dissemination.

11 (Pro rate as reasonable.)

12 906. IDENTIFY the location of the records which reflect the
13 costs and sums of money IDENTIFIED in your answer to questions 904
14 and 905 above.

15 907. IDENTIFY who ORDERED the inclusion and/or use of
16 CHRISTOFFERSON TRANSCRIPT 1 (CHRISTOFFERSON TRANSCRIPT 1 refers to
17 the DOCUMENT entitled "Gerry Armstrong Video Transcript for
18 November 17, 1984 (Entered as Evidence into the Christopherson
19 Case on April 1985,)" included as part of "Section 3" in DA DOC A
20 in PLAINTIFF'S PRODUCTION and Bates stamped with numbers 200071
21 through 200081) in DA DOC A.

22 908. WHEN did the person or persons IDENTIFIED in your
23 answer to the preceding question ORDER CHRISTOFFERSON TRANSCRIPT 1
24 included and/or used in DA DOC A?

25 909. IDENTIFY each person who approved the inclusion and/or
26 use of CHRISTOFFERSON TRANSCRIPT 1 in DA DOC A.

27 910. IDENTIFY each ORDER or other COMMUNICATION which
28

1 concerned or related in any way to the inclusion and/or use of
2 CHRISTOFFERSON TRANSCRIPT 1 in DA DOC A, and/or the use at any
3 time of CHRISTOFFERSON TRANSCRIPT 1 in any other context, way or
4 manner.

5 911. IDENTIFY each person, company, group, organization or
6 other entity to whom CHRISTOFFERSON TRANSCRIPT 1 has been
7 disseminated by anyone connected to the "church" at any time.

8 912. IDENTIFY each person who disseminated CHRISTOFFERSON
9 TRANSCRIPT 1 to each of the persons, companies, groups,
10 organizations or other entities, IDENTIFIED in your answer to the
11 preceding question.

12 913. Was the court file in the Christofferson case ever
13 sealed?

14 914. If your answer to the preceding question is "yes," what
15 was the date of such sealing?

16 915. If your answer to 913 above is "yes," were the pages
17 which have been Bates stamped 200073 through 200081 in DA DOC A
18 included in such sealing?

19 916. If your answer to the preceding question is "yes," was
20 the Christofferson case court file ever unsealed?

21 917. If your answer to the preceding question is "yes,"
22 IDENTIFY who ordered such unsealing?

23 918. If your answer to 916 above is "yes," WHEN was such
24 unsealing ordered?

25 919. Who ORDERED the inclusion and/or use of CHRISTOFFERSON
26 TRANSCRIPT 2 (CHRISTOFFERSON TRANSCRIPT 2 refers to the DOCUMENT
27 entitled "Gerry Armstrong Video Transcript for 7 November, 1984
28

1 (Entered as Evidence into the Christopherson Case on 10 April
2 1985.)" included as part of "Section 3" in DA DOC A in PLAINTIFF'S
3 PRODUCTION and Bates stamped with numbers 200082 through 200095)
4 in DA DOC A?

5 920. WHEN did the person or persons IDENTIFIED in your
6 answer to the preceding question ORDER CHRISTOFFERSON TRANSCRIPT 2
7 included and/or used in DA DOC A?

8 921. IDENTIFY each person who approved the inclusion and/or
9 use of CHRISTOFFERSON TRANSCRIPT 2 in DA DOC A.

10 922. IDENTIFY each ORDER or other COMMUNICATION which
11 concerned or related in any way to the inclusion and/or use of
12 CHRISTOFFERSON TRANSCRIPT 2 in DA DOC A, and/or the use at any
13 time of CHRISTOFFERSON TRANSCRIPT 2 in any other context, way or
14 manner.

15 923. IDENTIFY each person, company, group, organization or
16 other entity to whom CHRISTOFFERSON TRANSCRIPT 2 has been
17 disseminated by anyone connected to the "church" at any time.

18 924. IDENTIFY each person who disseminated CHRISTOFFERSON
19 TRANSCRIPT 2 to each of the persons, companies, groups,
20 organizations or other entities, IDENTIFIED in your answer to the
21 preceding question.

22 925. If your answer to 913 above is "yes," were the pages
23 which have been Bates stamped 200082 through 200095 in DA DOC A
24 included in such sealing?

25 926. Who ORDERED the inclusion and/or use of CHRISTOFFERSON
26 TRANSCRIPT 3 (CHRISTOFFERSON TRANSCRIPT 3 refers to the DOCUMENT
27 entitled "Gerry Armstrong Video Transcript for 9 November 1984
28

1 (Entered as Evidence into the Christopherson Case on 10 April
2 1985.)" included as "Section 4" in DA DOC A in PLAINTIFF'S
3 PRODUCTION and Bates stamped with numbers 200096 through 200101)
4 in DA DOC A?

5 927. WHEN did the person or persons IDENTIFIED in your
6 answer to the preceding question ORDER CHRISTOFFERSON TRANSCRIPT 3
7 included and/or used in DA DOC A?

8 928. IDENTIFY each person who approved the inclusion and/or
9 use of CHRISTOFFERSON TRANSCRIPT 3 in DA DOC A.

10 929. IDENTIFY each ORDER or other COMMUNICATION which
11 concerned or related in any way to the inclusion and/or use of
12 CHRISTOFFERSON TRANSCRIPT 3 in DA DOC A, and/or the use at any
13 time of CHRISTOFFERSON TRANSCRIPT 3 in any other context, way or
14 manner.

15 930. IDENTIFY each person, company, group, organization or
16 other entity to whom CHRISTOFFERSON TRANSCRIPT 3 has been
17 disseminated by anyone connected to the "church" at any time.

18 931. IDENTIFY each person who disseminated CHRISTOFFERSON
19 TRANSCRIPT 3 to each of the persons, companies, groups,
20 organizations or other entities, IDENTIFIED in your answer to the
21 preceding question.

22 932. If your answer to 913 above is "yes," were the pages
23 which have been Bates stamped 200095 through 200101 in DA DOC A
24 included in such sealing?

25 933. Who ORDERED the inclusion and/or use of CHRISTOFFERSON
26 TRANSCRIPT 4 (CHRISTOFFERSON TRANSCRIPT 4 refers to the untitled
27 DOCUMENT included as "Section 5" in DA DOC A in PLAINTIFF'S
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1 PRODUCTION and Bates stamped with numbers 200102 through 200104)
2 in DA DOC A?

3 934. WHEN did the person or persons IDENTIFIED in your
4 answer to the preceding question ORDER CHRISTOFFERSON TRANSCRIPT 4
5 included and/or used in DA DOC A?

6 935. IDENTIFY each person who approved the inclusion and/or
7 use of CHRISTOFFERSON TRANSCRIPT 4 in DA DOC A.

8 936. IDENTIFY each ORDER or other COMMUNICATION which
9 concerned or related in any way to the inclusion and/or use of
10 CHRISTOFFERSON TRANSCRIPT 4 in DA DOC A, and/or the use at any
11 time of CHRISTOFFERSON TRANSCRIPT 4 in any other context, way or
12 manner.

13 937. IDENTIFY each person, company, group, organization or
14 other entity to whom CHRISTOFFERSON TRANSCRIPT 4 has been
15 disseminated by anyone connected to the "church" at any time.

16 938. IDENTIFY each person who disseminated CHRISTOFFERSON
17 TRANSCRIPT 4 to each of the persons, companies, groups,
18 organizations or other entities, IDENTIFIED in your answer to the
19 preceding question.

20 939. If your answer to 913 above is "yes," were the pages
21 which have been Bates stamped 200102 through 200104 in DA DOC A
22 included in such sealing?

23 940. Who ORDERED the inclusion and/or use of CHRISTOFFERSON
24 TRANSCRIPT 5 (CHRISTOFFERSON TRANSCRIPT 5 refers to the DOCUMENT
25 entitled "Gerry Armstrong Video Transcript for 17 November 1984
26 (Entered as Evidence into the Christopherson Case on April 1985.)"
27 included as part of "Section 6" in DA DOC A in PLAINTIFF'S

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1 PRODUCTION and Bates stamped with numbers 200105 through 200108)
2 in DA DOC A?

3 941. WHEN did the person or persons IDENTIFIED in your
4 answer to the preceding question ORDER CHRISTOFFERSON TRANSCRIPT 5
5 included and/or used in DA DOC A?

6 942. IDENTIFY each person who approved the inclusion and/or
7 use of CHRISTOFFERSON TRANSCRIPT 5 in DA DOC A.

8 943. IDENTIFY each ORDER or other COMMUNICATION which
9 concerned or related in any way to the inclusion and/or use of
10 CHRISTOFFERSON TRANSCRIPT 5 in DA DOC A, and/or the use at any
11 time of CHRISTOFFERSON TRANSCRIPT 5 in any other context, way or
12 manner.

13 944. IDENTIFY each person, company, group, organization or
14 other entity to whom CHRISTOFFERSON TRANSCRIPT 5 has been
15 disseminated by anyone connected to the "church" at any time.

16 945. IDENTIFY each person who disseminated CHRISTOFFERSON
17 TRANSCRIPT 5 to each of the persons, companies, groups,
18 organizations or other entities, IDENTIFIED in your answer to the
19 preceding question.

20 946. If your answer to 913 above is "yes," were the pages
21 which have been Bates stamped 200105 through 200108 in DA DOC A
22 included in such sealing?

23 947. Who ORDERED the inclusion and/or use of CHRISTOFFERSON
24 TRANSCRIPT 6 (CHRISTOFFERSON TRANSCRIPT 6 refers to the DOCUMENT
25 entitled "Gerry Armstrong Video Transcript for 7 November 1984
26 (Entered as Evidence into the Christopherson Case on 10 April
27 1985.)" included as part of "Section 6" in DA DOC A in PLAINTIFF'S
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1 PRODUCTION and Bates stamped with numbers 200109 through 200123)
2 in DA DOC A?

3 948. WHEN did the person or persons IDENTIFIED in your
4 answer to the preceding question ORDER CHRISTOFFERSON TRANSCRIPT 6
5 included and/or used in DA DOC A?

6 949. IDENTIFY each person who approved the inclusion and/or
7 use of CHRISTOFFERSON TRANSCRIPT 6 in DA DOC A.

8 950. IDENTIFY each ORDER or other COMMUNICATION which
9 concerned or related in any way to the inclusion and/or use of
10 CHRISTOFFERSON TRANSCRIPT 6 in DA DOC A, and/or the use at any
11 time of CHRISTOFFERSON TRANSCRIPT 6 in any other context, way or
12 manner.

13 951. IDENTIFY each person, company, group, organization or
14 other entity to whom CHRISTOFFERSON TRANSCRIPT 6 has been
15 disseminated by anyone connected to the "church" at any time.

16 952. IDENTIFY each person who disseminated CHRISTOFFERSON
17 TRANSCRIPT 6 to each of the persons, companies, groups,
18 organizations or other entities, IDENTIFIED in your answer to the
19 preceding question.

20 953. If your answer to 913 above is "yes," were the pages
21 which have been Bates stamped 200109 through 200123 in DA DOC A
22 included in such sealing?

23 954. Who ORDERED the inclusion and/or use of CHRISTOFFERSON
24 TRANSCRIPT 7 (CHRISTOFFERSON TRANSCRIPT 7 refers to the DOCUMENT
25 entitled "Gerry Armstrong Video Transcript for 30 November 1984
26 (Entered as Evidence into the Christopherson Case on April 1985.)"
27 included as "Section 7" in DA DOC A in PLAINTIFF'S PRODUCTION and
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1 Bates stamped with numbers 200124 through 200133) in DA DOC A?

2 955. WHEN did the person or persons IDENTIFIED in your
3 answer to the preceding question ORDER CHRISTOFFERSON TRANSCRIPT 7
4 included and/or used in DA DOC A?

5 956. IDENTIFY each person who approved the inclusion and/or
6 use of CHRISTOFFERSON TRANSCRIPT 7 in DA DOC A.

7 957. IDENTIFY each ORDER or other COMMUNICATION which
8 concerned or related in any way to the inclusion and/or use of
9 CHRISTOFFERSON TRANSCRIPT 7 in DA DOC A, and/or the use at any
10 time of CHRISTOFFERSON TRANSCRIPT 7 in any other context, way or
11 manner.

12 958. IDENTIFY each person, company, group, organization or
13 other entity to whom CHRISTOFFERSON TRANSCRIPT 7 has been
14 disseminated by anyone connected to the "church" at any time.

15 959. IDENTIFY each person who disseminated CHRISTOFFERSON
16 TRANSCRIPT 7 to each of the persons, companies, groups,
17 organizations or other entities, IDENTIFIED in your answer to the
18 preceding question.

19 960. If your answer to 913 above is "yes," were the pages
20 which have been Bates stamped 200124 through 200133 in DA DOC A
21 included in such sealing?

22 961. Who ORDERED the inclusion and/or use of CHRISTOFFERSON
23 TRANSCRIPT 8 (CHRISTOFFERSON TRANSCRIPT 8 refers to the DOCUMENT
24 entitled "Gerry Armstrong Video Transcript for 9 November 1984
25 (Entered as Evidence into the Christo Case in April 1985.)"
26 included as "Section 8" in DA DOC A in PLAINTIFF'S PRODUCTION and
27 Bates stamped with numbers 200134 through 200138) in DA DOC A?

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1 962. WHEN did the person or persons IDENTIFIED in your
2 answer to the preceding question ORDER CHRISTOFFERSON TRANSCRIPT 8
3 included and/or used in DA DOC A?

4 963. IDENTIFY each person who approved the inclusion and/or
5 use of CHRISTOFFERSON TRANSCRIPT 8 in DA DOC A.

6 964. IDENTIFY each ORDER or other COMMUNICATION which
7 concerned or related in any way to the inclusion and/or use of
8 CHRISTOFFERSON TRANSCRIPT 8 in DA DOC A, and/or the use at any
9 time of CHRISTOFFERSON TRANSCRIPT 8 in any other context, way or
10 manner.

11 965. IDENTIFY each person, company, group, organization or
12 other entity to whom CHRISTOFFERSON TRANSCRIPT 8 has been
13 disseminated by anyone connected to the "church" at any time.

14 966. IDENTIFY each person who disseminated CHRISTOFFERSON
15 TRANSCRIPT 8 to each of the persons, companies, groups,
16 organizations or other entities, IDENTIFIED in your answer to the
17 preceding question.

18 967. If your answer to 913 above is "yes," were the pages
19 which have been Bates stamped 200134 through 200138 in DA DOC A
20 included in such sealing?

21 968. IDENTIFY each person who participated at any time in any
22 way whatsoever: in the arranging, setting up or staging of each of
23 the videotaping incidents from which CHRISTOFFERSON TRANSCRIPTS 1
24 through 8 derived or resulted; in the videotaping incidents from
25 which CHRISTOFFERSON TRANSCRIPTS 1 through 8 derived or resulted;
26 in the making of the videotapes from which CHRISTOFFERSON
27 TRANSCRIPTS 1 through 8 derived or resulted; in the editing or
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1 altering of any of the videotapes from which CHRISTOFFERSON
2 TRANSCRIPTS 1 through 8 derived or resulted; and in the
3 transcribing of any of the videotapes from which CHRISTOFFERSON
4 TRANSCRIPTS 1 through 8 derived or resulted.

5 969. DESCRIBE what actions of any kind whatsoever were taken
6 or performed by each of the persons IDENTIFIED in your answer to
7 the preceding question in the arranging, setting up or staging of
8 each of the videotaping incidents from which CHRISTOFFERSON
9 TRANSCRIPTS 1 through 8 derived or resulted; in the videotaping
10 incidents from which CHRISTOFFERSON TRANSCRIPTS 1 through 8
11 derived or resulted; in the making of the videotapes from which
12 CHRISTOFFERSON TRANSCRIPTS 1 through 8 derived or resulted; in the
13 editing or altering of any of the videotapes from which
14 CHRISTOFFERSON TRANSCRIPTS 1 through 8 derived or resulted; and in
15 the transcribing of any of the videotapes from which
16 CHRISTOFFERSON TRANSCRIPTS 1 through 8 derived or resulted.

17 970. IDENTIFY each sum of money in wages, fees, bribes or
18 reimbursement paid to each person IDENTIFIED in your answer to 968
19 above for each of his or her actions IDENTIFIED in your answer to
20 the preceding question.

21 971. IDENTIFY the location of the records which reflect the
22 sums of money IDENTIFIED in your answer to the preceding question.

23 972. IDENTIFY all financial costs for or relating in any way
24 to the arranging, setting up or staging of each of the videotaping
25 incidents from which CHRISTOFFERSON TRANSCRIPTS 1 through 8
26 derived or resulted; the videotaping incidents from which
27 CHRISTOFFERSON TRANSCRIPTS 1 through 8 derived or resulted; the

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1 making of the videotapes from which CHRISTOFFERSON TRANSCRIPTS 1
2 through 8 derived or resulted; the editing or altering of any of
3 the videotapes from which CHRISTOFFERSON TRANSCRIPTS 1 through 8
4 derived or resulted; and the transcribing of any of the videotapes
5 from which CHRISTOFFERSON TRANSCRIPTS 1 through 8 derived or
6 resulted.

7 973. IDENTIFY the location of the records which reflect the
8 financial costs IDENTIFIED in your answer to the preceding
9 question.

10 974. WHEN was DA DOC B (as used in these special
11 interrogatories, DA DOC B refers to the DOCUMENT entitled "False
12 REPORT Correction Gerald Armstrong" in PLAINTIFF'S PRODUCTION and
13 Bates stamped with numbers 200189 through 200297) prepared?

14 975. WHERE was DA DOC B prepared?

15 976. WHERE is the master or original of DA DOC B located?

16 977. IDENTIFY each person who participated in any way in the
17 preparation of DA DOC B.

18 978. IDENTIFY each sum of money each person IDENTIFIED in
19 your answer to the preceding question was paid at any time for his
20 or her participation in said preparation. (Pro rate as
21 reasonable.)

22 979. IDENTIFY the location of the records which reflect the
23 sums of money IDENTIFIED in your answer to the preceding question.

24 980. DESCRIBE what each of the persons IDENTIFIED in your
25 answer to 977 above did or what actions each took in preparing DA
26 DOC B.

27 981. IDENTIFY who was in charge of the preparation of DA DOC
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1 B.

2 982. IDENTIFY who ORDERED the preparation of DA DOC B.

3 983. IDENTIFY each person who approved the preparation of DA
4 DOC B.

5 984. IDENTIFY each ORDER or COMMUNICATION of any kind or
6 nature whatsoever which concerns or relates in any way to DA DOC
7 B.

8 985. IDENTIFY each person, company, group, organization or
9 other entity to whom DA DOC B has been disseminated by anyone at
10 any time.

11 986. WHEN was DA DOC B disseminated to each of the persons,
12 companies, groups, organizations or other entities IDENTIFIED in
13 your answer to the preceding question?

14 987. IDENTIFY each person who disseminated DA DOC B to each
15 of the persons, companies, groups, organizations or other
16 entities, IDENTIFIED in your answer to 985 above.

17 988. IDENTIFY each sum of money that each person IDENTIFIED
18 in your answer to the preceding question was paid at any time for
19 his or her participation in said dissemination. (Pro rate as
20 reasonable.)

21 989. IDENTIFY the location of the records which reflect the
22 sums of money IDENTIFIED in your answer to the preceding question.

23 990. IDENTIFY each person who ORDERED the dissemination of
24 DA DOC B to each of the persons, companies, groups, organizations
25 or other entities IDENTIFIED in your answer to 985 above.

26 991. IDENTIFY each administration or management policy of
27 any Scientology which was followed by each person IDENTIFIED in
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1 your answer to 977 and 987 above who carried out and in the course
2 of carrying out the preparation and dissemination of DA DOC B.

3 992. IDENTIFY all financial costs or expenditures for,
4 concerning or relating in any way whatsoever to the preparation
5 and dissemination of DA DOC B.

6 993. IDENTIFY the location of the records which reflect the
7 sums of money IDENTIFIED in your answer to the preceding question.

8 994. IDENTIFY all DOCUMENTS, other than those included within
9 DA DOC B, which support any of claims made in Bates stamped pages
10 200190 through 200198 of DA DOC B.

11 995. WHEN was DA DOC C (as used in these special
12 interrogatories, DA DOC C refers to the DOCUMENT entitled "Who Is
13 Gerald Armstrong" in PLAINTIFF'S PRODUCTION and Bates stamped with
14 numbers 200298 through 200356) prepared?

15 996. WHERE was DA DOC C prepared?

16 997. WHERE is the master or original of DA DOC C located?

17 998. IDENTIFY each person who participated in any way in the
18 preparation of DA DOC C.

19 999. IDENTIFY each sum of money each person IDENTIFIED in
20 your answer to the preceding question was paid at any time for his
21 or her participation in said preparation. (Pro rate as
22 reasonable.)

23 1000. IDENTIFY the location of the records which reflect the
24 sums of money IDENTIFIED in your answer to the preceding question.

25 1001. DESCRIBE what each of the persons IDENTIFIED in your
26 answer to 998 above did or what actions each took in preparing DA
27 DOC C.

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1 1002. IDENTIFY who was in charge of the preparation of DA
2 DOC C.

3 1003. IDENTIFY who ORDERED the preparation of DA DOC C.

4 1004. IDENTIFY each person who approved the preparation of
5 DA DOC C.

6 1005. IDENTIFY each ORDER or COMMUNICATION of any kind or
7 nature whatsoever from anyone connected to the "church" which
8 concerns or relates in any way to DA DOC C.

9 1006. IDENTIFY each person, company, group, organization or
10 other entity to whom DA DOC C has been disseminated by anyone at
11 any time.

12 1007. WHEN was DA DOC C disseminated to each of the persons,
13 companies, groups, organizations or other entities IDENTIFIED in
14 your answer to the preceding question?

15 1008. IDENTIFY each person who disseminated DA DOC C to each
16 of the persons, companies, groups, organizations or other
17 entities, IDENTIFIED in your answer to 1006 above.

18 1009. IDENTIFY each sum of money that each person IDENTIFIED
19 in your answer to the preceding question was paid at any time for
20 his or her participation in said dissemination. (Pro rate as
21 reasonable.)

22 1010. IDENTIFY the location of the records which reflect the
23 sums of money IDENTIFIED in your answer to the preceding question.

24 1011. IDENTIFY each person who ORDERED the dissemination of
25 DA DOC C to each of the persons, companies, groups, organizations
26 or other entities IDENTIFIED in your answer to 1006 above.

27 1012. IDENTIFY each administration or management policy of
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1 any Scientology which was followed by each person IDENTIFIED in
2 your answer to 998 and 1008 above who carried out and in the
3 course of carrying out the preparation and dissemination of DA DOC
4 C.

5 1013. IDENTIFY all financial costs or expenditures for,
6 concerning or relating in any way whatsoever to the preparation
7 and dissemination of DA DOC C.

8 1014. IDENTIFY the location of the records which reflect the
9 sums of money IDENTIFIED in your answer to the preceding question.

10 1015. IDENTIFY all DOCUMENTS, other than those included
11 within DA DOC C, which support any of claims made in Bates stamped
12 pages 200299 through 200302 of DA DOC C.

13 1016. IDENTIFY who wrote SENTENCE 46 (SENTENCE 46 refers to
14 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
15 200299 which states "Armstrong wanted "Joey" to plant in the
16 Church's files documents fabricated by Armstrong, who planned to
17 tell the IRS office in Los Angeles to conduct a raid against the
18 Church and find the "incriminating" documents.")

19 1017. State each fact on which you base the allegations in
20 SENTENCE 46.

21 1018. IDENTIFY each DOCUMENT which supports the allegations
22 in SENTENCE 46.

23 1019. WHEN did Armstrong allegedly communicate to Kluge that
24 he wanted Kluge "to plant in the Church's files documents
25 fabricated by Armstrong, who planned to tell the IRS office in Los
26 Angeles to conduct a raid against the Church and find the
27 "incriminating" documents?"

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1 1020. WHERE did Armstrong allegedly communicate to Kluge
2 that he wanted Kluge "to plant in the Church's files documents
3 fabricated by Armstrong, who planned to tell the IRS office in Los
4 Angeles to conduct a raid against the Church and find the
5 "incriminating" documents?"

6 1021. Was any videotape recording made of any meeting or
7 time in which Armstrong allegedly communicated to Kluge that he
8 wanted Kluge "to plant in the Church's files documents fabricated
9 by Armstrong, who planned to tell the IRS office in Los Angeles to
10 conduct a raid against the Church and find the "incriminating"
11 documents?"

12 1022. If your answer to the preceding question is "yes,"
13 IDENTIFY WHERE such original videotape recording, and all copies
14 thereof, are located.

15 1023. If your answer to 1021 above is "yes," IDENTIFY each
16 person who was involved in any way in the making of said videotape
17 recording.

18 1024. For each person IDENTIFIED in your answer to the
19 preceding question DESCRIBE his or her participation in any way in
20 the making of said videotape recording.

21 1025. If your answer to 1021 above is "yes," IDENTIFY each
22 person who approved the making of said videotape recording.

23 1026. IDENTIFY each sum of money in wages, fees, bribes or
24 reimbursement paid to anyone at any time for anything done in
25 connection with or relating in any way to the making of any
26 videotape recording of or involving Armstrong allegedly
27 communicating to Kluge that he wanted Kluge "to plant in the
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1 Church's files documents fabricated by Armstrong, who planned to
2 tell the IRS office in Los Angeles to conduct a raid against the
3 Church and find the "incriminating" documents."

4 1027. IDENTIFY the location of the records which reflect the
5 financial expenditures and/or costs IDENTIFIED in your answer to
6 the preceding question.

7 1028. If your answer to 1021 above is "yes," were any copies
8 or portions of copies of said videotape edited or altered in any
9 way whatsoever.

10 1029. If your answer to the preceding question is "yes,"
11 DESCRIBE each instance of such editing or altering.

12 1030. If your answer to 1028 above is "yes," IDENTIFY each
13 person who participated in any way in such editing or altering.

14 1031. IDENTIFY each sum of money in wages, fees or
15 reimbursement paid to anyone at any time for anything done in
16 connection with or relating in any way to the editing or altering
17 of any videotape recording of or involving Armstrong allegedly
18 communicating to Kluge that he wanted Kluge "to plant in the
19 Church's files documents fabricated by Armstrong, who planned to
20 tell the IRS office in Los Angeles to conduct a raid against the
21 Church and find the "incriminating" documents."

22 1032. IDENTIFY the location of the records which reflect the
23 financial expenditures and/or costs IDENTIFIED in your answer to
24 the preceding question.

25 1033. Was any audio recording made of any meeting or time in
26 which Armstrong allegedly communicated to Kluge that he wanted
27 Kluge "to plant in the Church's files documents fabricated by
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1 Armstrong, who planned to tell the IRS office in Los Angeles to
2 conduct a raid against the Church and find the "incriminating"
3 documents?"

4 1034. If your answer to the preceding question is "yes,"
5 IDENTIFY WHERE such audio recording, and all copies thereof, are
6 located.

7 1035. If your answer to 1033 above is "yes," IDENTIFY each
8 person who was involved in any way in the making of said audio
9 recording.

10 1036. For each person IDENTIFIED in your answer to the
11 preceding question DESCRIBE his or her participation in any way in
12 the making of said audio recording.

13 1037. If your answer to 1248 above is "yes," IDENTIFY each
14 person who approved the making of said audio recording.

15 1038. IDENTIFY each sum of money in wages, fees or
16 reimbursement paid to anyone at any time for anything done in
17 connection with or relating in any way to the making of any audio
18 recording of or involving Armstrong allegedly communicating to
19 Kluge that he wanted Kluge "to plant in the Church's files
20 documents fabricated by Armstrong, who planned to tell the IRS
21 office in Los Angeles to conduct a raid against the Church and
22 find the "incriminating" documents."

23 1039. IDENTIFY the location of the records which reflect the
24 sums of money, financial expenditures and/or costs IDENTIFIED in
25 your answer to the preceding question.

26 1040. IDENTIFY every ORDER or COMMUNICATION of any kind or
27 nature whatsoever concerning in any way Kluge's meeting with
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1 Armstrong in which Armstrong allegedly communicated to Kluge that
2 he wanted Kluge "to plant in the Church's files documents
3 fabricated by Armstrong, who planned to tell the IRS office in Los
4 Angeles to conduct a raid against the Church and find the
5 "incriminating" documents."

6 1041. IDENTIFY WHERE each ORDER or COMMUNICATION IDENTIFIED
7 in your answer to the preceding question was originated.

8 1042. IDENTIFY each person who approved each ORDER or
9 COMMUNICATION IDENTIFIED in your answer to 1040 above.

10 1043. IDENTIFY every REPORT Kluge made to anyone connected
11 to the "Church" which mentioned, concerned or related in any way
12 to his meeting with Armstrong when Armstrong allegedly
13 communicated to Kluge that he wanted Kluge "to plant in the
14 Church's files documents fabricated by Armstrong, who planned to
15 tell the IRS office in Los Angeles to conduct a raid against the
16 Church and find the "incriminating" documents."

17 1044. State the exact words said by Armstrong and DESCRIBE
18 the exact actions taken by Armstrong which have been interpreted
19 as Armstrong communicating to Kluge that he wanted Kluge "to plant
20 in the Church's files documents fabricated by Armstrong, who
21 planned to tell the IRS office in Los Angeles to conduct a raid
22 against the Church and find the "incriminating" documents," as
23 stated in SENTENCE 46.

24 1045. State precisely what Kluge said, wrote or communicated
25 in any way to Armstrong following each time Armstrong allegedly
26 communicated to Kluge that he wanted Kluge "to plant in the
27 Church's files documents fabricated by Armstrong, who planned to
28

1 tell the IRS office in Los Angeles to conduct a raid against the
2 Church and find the "incriminating" documents."

3 1046. State precisely what Kluge said, wrote or communicated
4 in any way to Armstrong prior to each time Armstrong allegedly
5 communicated to Kluge that he wanted Kluge "to plant in the
6 Church's files documents fabricated by Armstrong, who planned to
7 tell the IRS office in Los Angeles to conduct a raid against the
8 Church and find the "incriminating" documents."

9 1047. IDENTIFY each thing of any nature or description
10 whatsoever which Armstrong received in exchange for any conveyance
11 you contend is "fraudulent." -

12 1048. For each thing IDENTIFIED in your answer to the
13 preceding question, state its monetary value.

14 1049. For each thing IDENTIFIED in your answer to 1047
15 above, state its spiritual value.

16 1050. IDENTIFY every fact on which you base your contention
17 that God did not communicate to Armstrong to give away his things
18 away exactly as Armstrong did in August, 1990.

19 1051. IDENTIFY every DOCUMENT on which you base your
20 contention that God did not communicate to Armstrong to give away
21 his things away exactly as Armstrong did in August, 1990.

22 1052. IDENTIFY every fact on which you base your contention
23 that Armstrong was not carrying out God's Will when Armstrong gave
24 away his things away exactly as he did in August, 1990.

25 1053. IDENTIFY every DOCUMENT on which you base your
26 contention that Armstrong was not carrying out God's Will when
27 Armstrong gave away his things away exactly as he did in August,
28

1 1990.

2 1054. IDENTIFY who wrote SENTENCE 47 (SENTENCE 47 refers to
3 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
4 200301 which states "He has now stated both in deposition and in
5 his letters that he has no intention of abiding by the preliminary
6 injunction and that no Court can order him to abide by the
7 settlement agreement.")

8 1055. State each fact on which you base the allegations in
9 SENTENCE 47.

10 1056. IDENTIFY each DOCUMENT which supports the allegations
11 in SENTENCE 47.

12 1057. IDENTIFY by case, date, page and line number of the
13 deposition transcript each statement by Armstrong which you
14 contend states "that he has no intention of abiding by the
15 preliminary injunction."

16 1058. IDENTIFY by intended recipient, date and page number
17 of each of Armstrong's "letters" considered in or by SENTENCE 47
18 each statement by Armstrong which you contend states in said
19 "letters" "that he has no intention of abiding by the preliminary
20 injunction."

21 1059. IDENTIFY who wrote SENTENCE 48 (SENTENCE 48 refers to
22 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
23 200301 which states "Armstrong's attorney, Ford Greene, has been a
24 long-time attacker of religious movements.")

25 1060. State each fact on which you base the allegations in
26 SENTENCE 48.

27 1061. IDENTIFY each DOCUMENT which supports the allegations
28

1 in SENTENCE 48.

2 1062. IDENTIFY each alleged "religious movement" Greene
3 allegedly attacked.

4 1063. For each alleged "religious movement" IDENTIFIED in
5 your answer to the preceding question, IDENTIFY each of Greene's
6 alleged attacks on it.

7 1064. DESCRIBE each alleged attack IDENTIFIED in your answer
8 to the preceding question. In this interrogatory, "DESCRIBE" means
9 state in plain English WHEN Greene carried out each alleged
10 "attack," WHERE Greene carried out each alleged "attack," what
11 actions Greene took in each alleged "attack," IDENTIFY each other
12 person who participated in each alleged "attack" either as "co-
13 attacker" or defender against each alleged "attack" and what
14 actions were taken by each such IDENTIFIED other person in each
15 alleged "attack," and what damage of any kind or nature whatsoever
16 resulted to each IDENTIFIED "religious movement" from each
17 IDENTIFIED "attack."

18 1065. IDENTIFY who wrote SENTENCE 49 (SENTENCE 49 refers to
19 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
20 200302 which states "He has a history of using frivolous
21 litigation tactics to delay and prevent cases being tried.")

22 1066. State each fact on which you base the allegations in
23 SENTENCE 49.

24 1067. IDENTIFY each DOCUMENT which supports the allegations
25 in SENTENCE 49.

26 1068. IDENTIFY each instance of Greene allegedly "using
27 frivolous litigation tactics to delay and prevent cases being
28

1 tried" which forms "a history" of such, as considered in or by
2 SENTENCE 49. In this interrogatory "IDENTIFY" means for each
3 legal case which forms part of what you have alleged as "a history
4 of using frivolous litigation tactics to delay and prevent cases
5 being tried" provide its complete case title including the
6 IDENTITIES of all parties, the case number, the court and its
7 address, the date of each alleged "frivolous litigation tactic"
8 used by Greene in each case, the legal name for the action taken
9 by Greene in each case which you allege is a "frivolous litigation
10 tactic," whether or not the Court ruled or judged that what you
11 allege to be a "frivolous litigation tactic" was in fact a
12 frivolous litigation tactic, the date of any such ruling or
13 judgment, the name of the Judge, Judges or Justices making such
14 ruling or judgment; whether or not such ruling or judgment was
15 appealed, and, if such ruling or judgment was appealed, the date
16 of any result or opinion in each appeal and the legal citation for
17 such result or opinion.

18 1069. IDENTIFY each lawsuit of any kind or with any other
19 parties that you, the "Church," entities connected to you or to
20 the "Church," or entities you consider are "protected entities" by
21 the "settlement agreement" which is the subject of this lawsuit
22 have been involved in as a party from the beginning of the
23 "Church's" existence. In this interrogatory "IDENTIFY" means for
24 each lawsuit IDENTIFIED provide its complete case title including
25 the IDENTITIES of all parties, the case number, the court and its
26 address, a statement describing the final disposition of the
27 lawsuit or its present status if there has not been a final

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1 disposition.

2 1070. For each lawsuit IDENTIFIED in your answer to the
3 preceding question, IDENTIFY each time you, the "Church," or
4 entities connected to you or to the "Church" delayed it in any
5 manner or way whatsoever. In this interrogatory "IDENTIFY" means
6 for each lawsuit IDENTIFIED, state the date of each of the delays
7 you engineered or caused and the legal name for each tactic you
8 used to achieve each such delay.

9 1071. IDENTIFY who wrote SENTENCE 50 (SENTENCE 50 refers to
10 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
11 200302 which states "In August, 1992, Greene was forced to pay
12 \$6,167.23 in sanctions, plus \$797.81 in costs, to a fellow-
13 attorney after Greene's dishonest and unprofessional litigation
14 tactics were exposed in court.")

15 1072. IDENTIFY who ordered the inclusion or use of SENTENCE
16 50 in DA DOC C.

17 1073. State each fact on which you base the allegations in
18 SENTENCE 50.

19 1074. IDENTIFY each DOCUMENT which supports the allegations
20 in SENTENCE 50.

21 1075. WHEN was DA DOC D (as used in these special
22 interrogatories, DA DOC D refers to the DOCUMENT entitled "False
23 Report Correction Breckenridge" in PLAINTIFF'S PRODUCTION and
24 Bates stamped with numbers 200357 through 200668) prepared?

25 1076. WHERE was DA DOC D prepared?

26 1077. WHERE is the master or original of DA DOC D located?

27 1078. IDENTIFY each person who participated in any way in
28

28

1 the preparation of DA DOC D.

2 1079. IDENTIFY each sum of money each person IDENTIFIED in
3 your answer to the preceding question was paid at any time for his
4 or her participation in said preparation. (Pro rate as
5 reasonable.)

6 1080. IDENTIFY the location of the records which reflect the
7 sums of money IDENTIFIED in your answer to the preceding question.

8 1081. DESCRIBE what each of the persons IDENTIFIED in your
9 answer to 1078 above did or what actions each took in preparing DA
10 DOC D.

11 1082. IDENTIFY who was in charge of the preparation of DA
12 DOC D.

13 1083. IDENTIFY who ORDERED the preparation of DA DOC D.

14 1084. IDENTIFY each person who approved the preparation of
15 DA DOC D.

16 1085. IDENTIFY each ORDER or COMMUNICATION of any kind or
17 nature whatsoever which concerns or relates in any way to DA DOC
18 D.

19 1086. IDENTIFY each person, company, group, organization or
20 other entity to whom DA DOC D has been disseminated by anyone at
21 any time.

22 1087. WHEN was DA DOC D disseminated to each of the persons,
23 companies, groups, organizations or other entities IDENTIFIED in
24 your answer to the preceding question?

25 1088. IDENTIFY each person who disseminated DA DOC D to each
26 of the persons, companies, groups, organizations or other
27 entities, IDENTIFIED in your answer to 1086 above.

28

1 1089. IDENTIFY each sum of money that each person IDENTIFIED
2 in your answer to the preceding question was paid at any time for
3 his or her participation in said dissemination. (Pro rate as
4 reasonable.)

5 1090. IDENTIFY the location of the records which reflect the
6 sums of money IDENTIFIED in your answer to the preceding question.

7 1091. IDENTIFY each person who ORDERED the dissemination of
8 DA DOC D to each of the persons, companies, groups, organizations
9 or other entities IDENTIFIED in your answer to 1086 above.

10 1092. IDENTIFY each administration or management policy of
11 any Scientology which was followed by each person IDENTIFIED in
12 your answer to 1084 and 1088 above who carried out and in the
13 course of carrying out the preparation and dissemination of DA DOC
14 D.

15 1093. IDENTIFY all financial costs or expenditures for,
16 concerning or relating in any way whatsoever to the preparation
17 and dissemination of DA DOC D.

18 1094. IDENTIFY the location of the records which reflect the
19 sums of money IDENTIFIED in your answer to the preceding question.

20 1095. IDENTIFY all DOCUMENTS, other than those included
21 within DA DOC D, which support any of claims made in Bates stamped
22 pages 200358 through 200370 of DA DOC D.

23 1096. IDENTIFY who wrote SENTENCE 51 (SENTENCE 51 refers to
24 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
25 200370 which states "Any such directive [authorizing or ordering
26 the culling of supposedly confidential auditing files] is not part
27 of the Scientology scriptures and was long ago canceled;"

28

1 hereinafter "SENTENCE 51."

2 1097. State each fact on which you base the allegations in
3 SENTENCE 51.

4 1098. IDENTIFY each DOCUMENT which supports the allegations
5 in SENTENCE 51.

6 1099. IDENTIFY each administration or management policy of
7 Scientology or ORDER which allegedly canceled the practice of
8 "culling supposedly confidential" auditing files.

9 1100. WHEN was DA DOC E (as used in these special
10 interrogatories, DA DOC E refers to the DOCUMENT entitled "Gerald
11 Armstrong" in PLAINTIFF'S PRODUCTION and Bates stamped with
12 numbers 200669 through 200759) prepared?

13 1101. WHERE was DA DOC E prepared?

14 1102. WHERE is the master or original of DA DOC E located?

15 1103. IDENTIFY each person who participated in any way in
16 the preparation of DA DOC E.

17 1104. IDENTIFY each sum of money each person IDENTIFIED in
18 your answer to the preceding question was paid at any time for his
19 or her participation in said preparation. (Pro rate as
20 reasonable.)

21 1105. IDENTIFY the location of the records which reflect the
22 sums of money IDENTIFIED in your answer to the preceding question.

23 1106. DESCRIBE what each of the persons IDENTIFIED in your
24 answer to 1103 above did or what actions each took in preparing DA
25 DOC E.

26 1107. IDENTIFY who was in charge of the preparation of DA
27 DOC E.

28

1 1108. IDENTIFY who ORDERED the preparation of DA DOC E.

2 1109. IDENTIFY each person who approved the preparation of
3 DA DOC E.

4 1110. IDENTIFY each ORDER or COMMUNICATION of any kind or
5 nature whatsoever which concerns or relates in any way to DA DOC
6 E.

7 1111. IDENTIFY each person, company, group, organization or
8 other entity to whom DA DOC E has been disseminated by anyone at
9 any time.

10 1112. WHEN was DA DOC E disseminated to each of the persons,
11 companies, groups, organizations or other entities IDENTIFIED in
12 your answer to the preceding question?

13 1113. IDENTIFY each person who disseminated DA DOC E to each
14 of the persons, companies, groups, organizations or other
15 entities, IDENTIFIED in your answer to 1111 above.

16 1114. IDENTIFY each sum of money that each person IDENTIFIED
17 in your answer to the preceding question was paid at any time for
18 his or her participation in said dissemination. (Pro rate as
19 reasonable.)

20 1115. IDENTIFY the location of the records which reflect the
21 sums of money IDENTIFIED in your answer to the preceding question.

22 1116. IDENTIFY each person who ORDERED the dissemination of
23 DA DOC E to each of the persons, companies, groups, organizations
24 or other entities IDENTIFIED in your answer to 1111 above.

25 1117. IDENTIFY each administration or management policy of
26 any Scientology which was followed by each person IDENTIFIED in
27 your answer to 1103 and 1113 above who carried out and in the
28

1 course of carrying out the preparation and dissemination of DA DOC
2 E.

3 1118. IDENTIFY all financial costs or expenditures for,
4 concerning or relating in any way whatsoever to the preparation
5 and dissemination of DA DOC E.

6 1119. IDENTIFY the location of the records which reflect the
7 costs or sums of money IDENTIFIED in your answer to the preceding
8 question.

9 1120. IDENTIFY all DOCUMENTS, other than those included
10 within DA DOC E, which support any of claims made in Bates stamped
11 pages 200669 through 200671 of DA DOC E. -

12 1121. IDENTIFY who wrote SENTENCE 52 (SENTENCE 52 refers to
13 the sentence found in PLAINTIFF'S PRODUCTION at Bates stamped page
14 200670 which states "When they did so [Armstrong or his counsel
15 surrendered documents as part of the settlement], copies of the
16 documents which Armstrong had stolen from the Church in December
17 1981 were provided, demonstrating that Armstrong had perjured
18 himself numerous times throughout the history of the litigation
19 when he asserted that all such copies were surrendered to the
20 court.")

21 1122. State each fact on which you base the allegations in
22 SENTENCE 52.

23 1123. IDENTIFY each DOCUMENT which supports the allegations
24 in SENTENCE 52.

25 1124. IDENTIFY each DOCUMENT which Armstrong or his counsel
26 surrendered as part of or at the time of the December, 1986
27 settlement referred to in SENTENCE 52.

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1 1125. IDENTIFY each DOCUMENT which Armstrong or his counsel
2 surrendered which demonstrated "that Armstrong had perjured
3 himself numerous times throughout the history of the litigation
4 when he asserted that all such copies were surrendered to the
5 court;" as alleged in SENTENCE 52.

6 1126. IDENTIFY each of the "numerous times throughout the
7 history of the litigation when" Armstrong "perjured himself" by
8 "assert[ing] that all such copies were surrendered to the court."
9 In this interrogatory, "IDENTIFY" means state the date of each
10 such alleged perjurious statement, the form of each such alleged
11 perjurious statement, exactly what was stated by Armstrong in each
12 alleged perjurious statement, to whom each such alleged perjurious
13 statement was made, and if any such alleged perjurious statement
14 was written IDENTIFY the document in which each such was made.

15 1127. IDENTIFY who wrote SENTENCE 53 (SENTENCE 53 refers to
16 the sentence found in a letter signed by your president Heber
17 Jentzsch in PLAINTIFF'S PRODUCTION at Bates stamped page 200762
18 which states "He (Armstrong) has no relation to art or to artists
19 and has no history of being published anywhere - except, of course
20 the photo of himself, nude, hugging the globe of the world and
21 promoting the idea that everyone should give away what money they
22 have.")

23 1128. State each fact on which you base the allegations in
24 SENTENCE 53.

25 1129. IDENTIFY each DOCUMENT which supports the allegations
26 in SENTENCE 53.

27 1130. State each fact on which you base the allegation in
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1 SENTENCE 53 that the referred to photo was of Armstrong "nude."

2 1131. IDENTIFY each COMMUNICATION from anyone connected to
3 the "church" of the allegation that the photo of Armstrong
4 referred to in SENTENCE 53 was of him "nude."

5 1132. For each COMMUNICATION IDENTIFIED in your answer to
6 the preceding question IDENTIFY each person, company, group,
7 organization or other entity to whom such COMMUNICATION was made.

8 1133. For each COMMUNICATION IDENTIFIED in your answer to
9 1131 above state WHERE such COMMUNICATION occurred.

10 1134. For each written COMMUNICATION IDENTIFIED in your
11 answer to 1131 above IDENTIFY the location of the original and all
12 copies of each such COMMUNICATION.

13 1135. State each fact on which you base the allegation in
14 SENTENCE 53 that Armstrong "has no relation to art or to artists."

15 1136. IDENTIFY each DOCUMENT which supports your allegation
16 in SENTENCE 53 that Armstrong "has no relation to art or to
17 artists."

18 1137. State each fact on which you base the allegation in
19 SENTENCE 53 that Armstrong "has no history of being published
20 anywhere."

21 1138. IDENTIFY each location checked and each publication
22 checked to ascertain if Armstrong had ever been published prior to
23 your making the allegation that he "has no history of being
24 published anywhere."

25 1139. IDENTIFY each DOCUMENT which supports your allegation
26 in SENTENCE 53 that Armstrong "has no history of being published
27 anywhere."

28

1 1140. IDENTIFY each publication of any kind whatsoever
2 originated by, contributed to, or possessed by you or any entities
3 related to the "Church" which contains any statement or writing of
4 any kind whatsoever written by or attributed to Armstrong. In
5 this interrogatory "IDENTIFY" means state in English the
6 publication title, publisher, publication owner, publication type
7 (i.e., e.g., but not limited to, magazine, newspaper, tabloid,
8 periodical, journal, electronic bulletin board, handout, pamphlet,
9 book, booklet, or any Scientology policy or other issue type),
10 date of issue, volume or publication, and the place of publication
11 or printing.

12 1141. For each publication IDENTIFIED in your answer to the
13 preceding question IDENTIFY the location of the original or master
14 and its copies.

15 1142. For each publication IDENTIFIED in your answer to 1140
16 IDENTIFY therein each statement or writing of any kind whatsoever
17 written by or attributed to Armstrong. In this interrogatory
18 "IDENTIFY" means state WHERE the statement or writing is located
19 in the publication and provide the exact and complete text of such
20 statement or writing.

21 1143. For each publication IDENTIFIED in your answer to 1140
22 IDENTIFY each person, company, group, organization or other entity
23 to whom such publication was disseminated.

24 1144. For each statement or writing IDENTIFIED in your
25 answer to 1142 above written by or attributed to Armstrong,
26 IDENTIFY WHO ORDERED its inclusion in each publication in which it
27 was used.

28

1 1145. For each statement or writing IDENTIFIED in your
2 answer to 1142 above written by or attributed to Armstrong,
3 IDENTIFY WHO approved its inclusion in each publication in which
4 it was used.

5 1146. IDENTIFY all ORDERS or COMMUNICATIONS of any kind
6 whatsoever from anyone connected to the "church" which concern or
7 relate in any way to each statement or writing IDENTIFIED in your
8 answer to 1142 above written by or attributed to Armstrong.

9 1147. For each statement or writing of any kind whatsoever
10 written by or attributed to Armstrong IDENTIFIED in your answer to
11 1142 above did you or any entities related to the "Church" request
12 Armstrong's permission to publish such statement or writing?

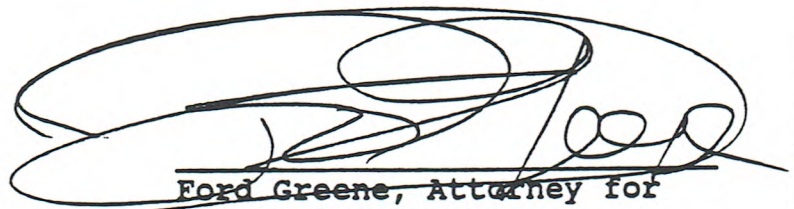
13 1148. If your answer to the preceding question is "yes,"
14 IDENTIFY each COMMUNICATION from you requesting such permission
15 from Armstrong.

16 1149. For each statement or writing of any kind whatsoever
17 written by or attributed to Armstrong IDENTIFIED in your answer to
18 1142 above did you or any entities related to the "Church" obtain
19 Armstrong's permission to publish such statement or writing?

20 1150. If your answer to the preceding question is "yes,"
21 IDENTIFY each COMMUNICATION from Armstrong granting such
22 permission.

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Dated: January 9, 1995



Ford Greene, Attorney for
Gerald Armstrong

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PROOF OF SERVICE

I am employed in the county of Marin, State of California. I am over the age of eighteen years and not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California 94960. I served the foregoing document(s) described as:

GERALD ARMSTRONG'S AMENDED SPECIALLY PEREPARED INTERROGATORIES TO CHURCH OF SCIENTOLOGY INTERNATIONAL - SET ONE

on the following persons on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Laurie J. Bartilson, Esquire MAIL
BOWLES & MOXON
6255 Sunset Boulevard, Suite 2000
Los Angeles, CA 90028

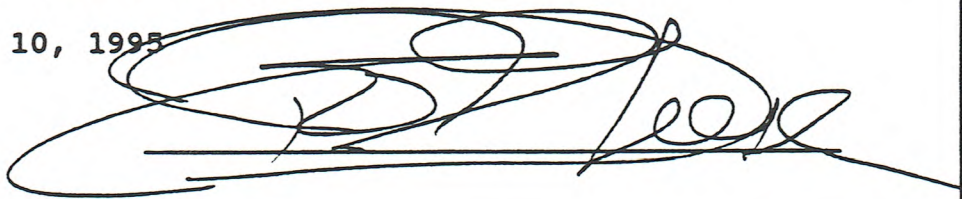
Michael L. Walton, Esquire MAIL
P.O. Box 751
San Anselmo, CA 94979

(By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

(Personal) I caused said papers to be personally served on the office of counsel.

(State) I declare under the penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: January 10, 1995



IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF MARIN

---oOo---

CHURCH OF SCIENTOLOGY)
INTERNATIONAL, a California)
not-for-profit religious)
corporation,)
)
Plaintiff,)
)
vs.)
)
GERALD ARMSTRONG; MICHALE)
WALTON; THE GERALD ARMSTRONG)
CORPORATION, a California for)
profit corporation; DOES 1)
through 100, inclusive,)
)
Defendants.)
)
_____)
AND RELATED CROSS-ACTION.)
_____)

COPY

NO. 157-680

DEPOSITION OF:

LYNN R. FARNY

Monday, July 11, 1994

VOLUME I

Reported by:
PENNY L. GILMORE
CSR NO. 4724

PENNY L. GILMORE & ASSOCIATES
DEPOSITION REPORTERS
P.O. BOX 862
ROSS, CALIFORNIA 94957
(415) 457-7899

1 A. I have no idea and I haven't adopted your
2 397,000. I said around 400,000. Your question is would
3 that have included a mortgage? Is that the equity in the
4 house or is that the overall value of the house, whatever?

5 Q. I'm trying to find out --

6 A. I'm not certain but my understanding is -- and
7 it's approaching its limit -- is that Armstrong owned it
8 free and clear -- but I'm not certain of that fact -- at
9 the time it was conveyed to you.

10 Q. What's a dead agent pack?

11 MR. MOXON: Objection, relevance. Does this
12 have something to do with the transfer?

13 MR. WALTON: Has to do with documents that I
14 understand Scientology produced pursuant to a document
15 request in this litigation.

16 MR. MOXON: Relevance?

17 THE WITNESS: Which you didn't receive.

18 MR. WALTON: I didn't receive, no. And I did
19 receive this document; it was brought to my attention. I
20 want to find out now if in fact it was a document
21 Scientology produced and what it is.

22 MR. MOXON: Again, I object.

23 MR. WALTON: Q. Do you recognize --

24 MR. MOXON: Again, I object as to relevance.
25 The relevance is that it was produced?

1 MR. WALTON: It was produced, as I understand
2 it, it was produced in a document request by Scientology.
3 Mr. Armstrong and Mr. Armstrong's corporation requested
4 certain documents responsive to this litigation and this
5 was one of the documents that was produced. If it wasn't
6 relevant, why did Scientology produce it?

7 MS. BARTILSON: They produced a lot of --

8 MR. MOXON: Can I ask the relevance other than
9 you think someone else thought it might be relevant?

10 MR. WALTON: I want to find out --

11 MR. MOXON: If you don't know if it's relevant
12 or not then I object to the relevance without a proper
13 ruling.

14 MR. WALTON: Let's find out if Scientology
15 produced it.

16 MR. MOXON: I'm sorry, I'm asking what the
17 relevance is other than you think someone else may have
18 produced it.

19 MR. WALTON: This is an allegation concerning
20 me. I would like to find out about them.

21 MS. BARTILSON: In this document there's
22 allegations concerning you?

23 MR. WALTON: That's correct.

24 MR. BENZ: I think Mr. Walton is entitled to
25 find out whether or not this witness knows it was produced

1 in the document production in this litigation.

2 THE WITNESS: Your question, sir?

3 MR. WALTON: Q. Was this document produced in
4 response to a document request in this litigation?

5 MR. MOXON: Hold on a second, let me take a look
6 at it.

7 THE WITNESS: It appears to be a document
8 produced in this litigation, yes.

9 MR. WALTON: Q. Could you tell me the origin of
10 this document?

11 A. How's that?

12 Q. The origin, can you tell me the origin, where
13 the document came from?

14 A. It came from us.

15 Q. Who prepared it? "From us," you mean the
16 plaintiff?

17 A. Yes, the plaintiff. Various staff of CSI. This
18 looks like my writing in terms of content. It's a
19 typewritten document.

20 Q. Who would have directed this document to be
21 produced?

22 MR. MOXON: Who would have?

23 MR. WALTON: Q. Who did, if you know?

24 MS. BARTILSON: Objection, assumes facts not in
25 evidence that someone directed it to be written.

1 THE WITNESS: I don't remember. Save you a
2 second question, I don't remember.

3 MR. GREENE: Why don't we mark this as an
4 exhibit since you are asking questions about it?

5 (Whereupon Defendant's Exhibit number 1
6 was marked for identification.)

7 MR. WALTON: Q. What part of this appears to be
8 your writing?

9 A. Or was in an earlier incarnation. The material
10 from the Griffith Park tapes, the material discussing the
11 breaches. The material concerning Ford Greene does not
12 appear to be originated from something I wrote. And,
13 again, as to the earlier portions of it it was either --
14 there was an earlier incarnation of this that this
15 material came from a draft, if you will.

16 Q. This is a document entitled Who Is Gerald
17 Armstrong. That's, I believe, your document number 200298
18 on page one. Is that Scientology-marked numeration?

19 A. If we produced it, which I believe we did, it
20 would have been our Bates stamp. It goes, for clarity,
21 through 200302. Ford is happy with that.

22 Q. I understand that the section representations
23 referred to attachments that were produced when this
24 original document was produced.

25 A. I don't remember. I see references to sections

1 document, for one.

2 MR. BENZ: If you want to ask something was this
3 produced as part of a dead agent pack plan or something,
4 fine. Without more on what dead agent pack means I
5 can't --

6 MR. MOXON: Why don't we let the witness give a
7 definition so we can get back to the deposition.

8 THE WITNESS: The phrase "dead agent pack" is
9 slang. It refers to a pack which compiles the truth about
10 someone who's been telling lies, and the term springs from
11 Sun Tsu's book on war and wherein he describes various
12 different types of agents and one which he describes as
13 dead agent is one who's been feeding lies whose lies have
14 been exposed; and as an information source he is dead in
15 the eyes of the individuals to whom he has been spreading
16 false information.

17 That book was written several centuries ago. In
18 those days he was dead more that just as an information
19 source. But today it's slang for information pack which,
20 if you will, communicates the truth about the individual
21 in such a way that their credibility with the source to
22 whom they have been spreading false information no longer
23 exists.

24 MR. BENZ: Can I ask one question in case this
25 comes up again? You are talking a pack?

1 THE WITNESS: P-A-C-K, package. This is a
2 several page memo which would have documentation attached.

3 MR. BENZ: I wasn't sure about the word pack or
4 pact, whatever.

5 MR. WALTON: Q. Is this a dead agent pack?

6 A. No, it's a cover write-up but there's no package
7 of information with it.

8 Q. I'm sort of at a disadvantage because I haven't
9 been served with these documents. It's my understanding
10 there were a number of documents such as four, five, six,
11 seven, eight, nine, number of sections that are referred
12 to that Ford --

13 A. Ford doesn't indicate it's attached; just says
14 "video available."

15 Q. In the original that was produced to Mr.
16 Armstrong's attorney, would you consider the original as a
17 dead agent's pack?

18 A. As I testified, I don't remember if we produced
19 the package of information that goes with it. If we did,
20 I would have, yes.

21 Q. Is that the same thing as black propaganda?

22 A. No.

23 Q. Could you tell me what black propaganda is?

24 A. Black propaganda is what one is trying to
25 correct when one compiles a dead agent pack. It's when

1 someone is spreading lies about someone to destroy their
2 reputation. The way you deal with that is document the
3 truth, and then the people to whom the black propaganda
4 has been spread hopefully no longer believe the lies.

5 Q. Do you have any knowledge of the entities to
6 whom this document was disseminated?

7 A. Not really.

8 Q. Are there any records to show what entities to
9 whom this document would have been disseminated?

10 A. No, it no longer would have been kept. It would
11 have been disseminated where needful to correct false
12 reports. I don't remember to whom it was disseminated.

13 Q. On page Bates-stamped 200301, the last line of
14 the fifth full paragraph, it says "Walton also knew of
15 Armstrong's intention to breach the agreement and was thus
16 fully aware of the fraudulent nature of the conveyance."

17 Do you see that line?

18 A. Yes.

19 Q. Is that a line that you wrote?

20 A. Possibly.

21 Q. Could you briefly outline what facts Scientology
22 has in their possession that would support this statement?

23 A. There's a statement in the first half of the
24 sentence and a conclusion in the second half. I assume
25 you want the first half. The second half of the sentence

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CERTIFICATE OF DEPOSITION OFFICER

I, PENNY L. GILMORE, duly authorized to administer oaths pursuant to Section 8211 of the California Code of Civil Procedure, do hereby certify that LYNN ROBERT FARNY, the witness in the foregoing deposition, was by me duly sworn to testify the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place herein stated, that the testimony of said witness was reported by me, a Certified Shorthand Reporter and a disinterested person, and was thereafter transcribed into computer-assisted transcription under my direction.

I futher certify that I am not of counsel or attorney for either or any of the parties in the foregoing depositon and caption named, nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 6th day of August 1994.

DEPOSITION OFFICER, CSR NO. 4724

I hereby certify this copy is a true and exact copy of the Original.


DEPOSITION OFFICER, CSR NO. 4724

1 Ford Greene, Esquire
California State Bar No. 107601
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711 Sir Francis Drake Boulevard
3 San Anselmo, California 94960-1949
Telephone: (415) 258-0360
4

5 PAUL MORANTZ, ESQ.
P.O. Box 511
Pacific Palisades, CA 90272
6 (213) 459-4745

7 Attorneys for Defendant
GERALD ARMSTRONG
8
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 IN AND FOR THE COUNTY OF LOS ANGELES
12

13 CHURCH OF SCIEN TOLOGY) No. BC 052395
14 INTERNATIONAL, a California)
not-for-profit religious) VERIFIED AMENDED
15 corporation;) CROSS-COMPLAINT FOR DECLARATORY
16 Plaintiffs,) RELIEF, ABUSE OF PROCESS, AND
BREACH OF CONTRACT
17 vs.)

18 GERALD ARMSTRONG; DOES 1)
through 25, inclusive,)
19 Defendants.)
20

21 _____)
GERALD ARMSTRONG,)
22 Cross-Complainant,)
23

24 -vs-)

25 CHURCH OF SCIEN TOLOGY)
INTERNATIONAL, a California)
Corporation, CHURCH OF)
26 SCIEN TOLOGY OF CALIFORNIA, a)
California Corporation,)
27 RELIGIOUS TECHNOLOGY CENTER, a)
California Corporation,)
28 CHURCH OF SPIRITUAL)

1 TECHNOLOGY,)
 a California Corporation,)
 2 AUTHOR SERVICES, INCORPORATED,)
 a California Corporation,)
 3 AUTHOR'S FAMILY TRUST, ESTATE)
 OF L. RON HUBBARD, DAVID)
 4 MISCAVIGE, NORMAN STARKEY)
 and DOES 1 through 100,)
 5 inclusive,)
)
 6 Cross-Defendants.)
)
 7 _____)

8 Cross-Complainant GERALD ARMSTRONG alleges as follows:

9 PARTIES

10 1. Cross-Complainant GERALD ARMSTRONG, hereinafter,
 11 "ARMSTRONG," is a resident of Marin County, California.

12 2. Cross-Defendants CHURCH OF SCIENTOLOGY
 13 INTERNATIONAL, hereinafter "CSI," CHURCH OF SCIENTOLOGY OF
 14 CALIFORNIA, hereinafter "CSC," RELIGIOUS TECHNOLOGY CENTER,
 15 hereinafter "RTC," CHURCH OF SPIRITUAL TECHNOLOGY, hereinafter
 16 "COST," and AUTHOR SERVICES, INCORPORATED, hereinafter "ASI," are
 17 corporations organized and existing under the laws of the State of
 18 California, having principal offices and places of business in
 19 California and doing business within the State of California
 20 within the territorial jurisdiction of this Court.

21 3. Cross-Defendants AUTHOR'S FAMILY TRUST, hereinafter
 22 "AFT," and ESTATE OF L. RON HUBBARD, hereinafter "ERH," are
 23 entities that are residents of the State of California.

24 4. Cross-Defendant DAVID MISCAVIGE, hereinafter
 25 "MISCAVIGE," is an individual domiciled in the State of
 26 California.

27 5. Cross-Defendant NORMAN STARKEY, hereinafter
 28 "STARKEY," is an individual domiciled in the State of California.

1 6. At all times herein mentioned, each Cross-Defendant
2 was the agent, employee or coconspirator of each of the remaining
3 Cross-Defendants, and in doing the things herein mentioned, each
4 Cross-Defendant was acting within the course and scope of its
5 employment and authority as such agent and/or representative
6 and/or employee and/or coconspirator, and with the consent of the
7 remaining Cross-Defendants.

8 7. Corporate Cross-Defendants named in paragraph 2,
9 above, are subject to a unity of control, and the separate alleged
10 corporate structures were created as an attempt to avoid payment
11 of taxes and civil judgments and to confuse courts and those
12 seeking redress for these Cross-Defendants' acts. Due to the
13 unity of personnel, commingling of assets, and commonality of
14 business objectives, these Cross-Defendants' attempts at
15 separation of these corporations should be disregarded.

16 8. The designation of Cross-Defendants as "churches"
17 or religious entities is a sham contrived to exploit the
18 protection of the First Amendment of the United States
19 Constitution and to justify their criminal, and tortious acts
20 against ARMSTRONG and their others. Cross-Defendant corporations
21 are an international, money-making, politically motivated
22 enterprise which subjugates and exploits its employees and
23 customers with coercive psychological techniques, threat of
24 violence and blackmail. Cross-Defendant corporations, CSI, CSC,
25 RTC, COST and ASI act as one organization and are termed
26 hereinafter as the "ORG."

27 9. Cross-Defendant MISCAVIGE controls and operates the
28 ORG and uses it to enforce his orders and carry out his attacks on

1 groups, agencies or individuals, including the acts against
2 ARMSTRONG alleged herein to the extent there is no separate
3 identity between MISCAVIGE and the ORG and any claim of such
4 separate identity should be disregarded.

5 10. Cross-Defendant entities AFT and ERH derive
6 financial benefit from the ORG, participate in its acts against
7 groups, agencies or individuals, including ARMSTRONG, and
8 participate in MISCAVIGE's and the ORG's efforts to avoid payment
9 of taxes and civil judgments and to confuse courts and persons
10 seeking redress of grievances against MISCAVIGE and the ORG.

11 11. Cross-Defendant STARKEY controls and operates AFT
12 and ERH and uses them in conspiracy with MISCAVIGE to carry out
13 their attacks on groups, agencies or individuals, including the
14 acts against ARMSTRONG alleged herein.

15 12. Cross-Defendants DOES 1 through 100, inclusive, are
16 sued herein under such fictitious names for the reason that the
17 true names and capacities of said Cross-Defendants are unknown to
18 ARMSTRONG at this time; that when the true names and capacities of
19 said Cross-Defendants are ascertained ARMSTRONG will ask leave of
20 Court to amend this Cross-Complaint to insert the true names and
21 capacities of said fictitiously named Cross-Defendants, together
22 with any additional allegations that may be necessary in regard
23 thereto; that each of said fictitiously named Cross-Defendants
24 claim that ARMSTRONG has a legal obligation to Cross-Defendants by
25 virtue of the facts set forth below; that each of said
26 fictitiously named Cross-Defendants is in some manner legally
27 responsible for the acts and occurrences hereinafter alleged.

28

1 FACTUAL ALLEGATIONS

2 13. From 1969 through 1981 ARMSTRONG was a
3 Scientologist who devoted his life to Scientology founder, L. Ron
4 Hubbard, the ideals he proclaimed and the Scientology organization
5 he claimed to have built to promulgate those ideals. After
6 leaving Hubbard's and the organization's employ and control in
7 December 1981, ARMSTRONG was declared by the ORG a "Suppressive
8 Person," or "SP," which designated him an "enemy," and became the
9 target of Hubbard's policy of "Fair Game," which states:

10 "ENEMY - SP Order. Fair Game. May be deprived of
11 property or injured by any means by any
12 Scientologist without any discipline of the
13 Scientologist. May be tricked, sued or lied to or
14 destroyed."

15 The ORG, using Cross-Defendant herein CSC as Plaintiff, filed a
16 lawsuit, No. C 420153, in the Los Angeles Superior Court against
17 ARMSTRONG on August 2, 1982. ARMSTRONG filed a Cross-Complaint
18 against Cross-Defendants CSC and L. RON HUBBARD September 17,
19 1982, and a Third Amended Cross-Complaint against Cross-Defendants
20 CSC, CSI, RTC and L. RON HUBBARD July 1, 1983. The Complaint and
21 the Cross-Complaint thereto, hereinafter referred to together as
22 Armstrong I, were bifurcated and the underlying Complaint was
23 tried without a jury in 1984. A Memorandum of Intended Decision
24 was rendered by Judge Paul G. Breckenridge, Jr. June 20, 1984 and
25 entered as a Judgment August 10, 1984. The ORG appealed.

26 14. During the Armstrong I litigation the ORG carried
27 out a massive and international campaign of Fair Game against
28 ARMSTRONG and his lawyer, Michael J. Flynn of Boston,

1 Massachusetts, hereinafter "Flynn," who had been the prime mover
2 in much of the anti-ORG-related litigation throughout the United
3 States. Acts against ARMSTRONG pursuant to Fair Game included
4 assault, an attempted staged highway accident, attempted
5 entrapment, theft of private papers and original artwork,
6 dissemination of information from his confidential "counseling"
7 records, filing false criminal charges on at least five occasions,
8 global defamation, threat of murder, and illegal electronic
9 surveillance. ARMSTRONG learned during the period he was
10 represented in the litigation by Flynn that Fair Game acts against
11 Flynn included attempted murder, theft of private papers, threats
12 against his family, defamation, thirteen frivolous lawsuits,
13 spurious bar complaints, and framing with the forgery of a
14 \$2,000,000 check on a bank account of L. Ron Hubbard.

15 15. In the fall of 1986, while working as a paralegal
16 in the Flynn firm, ARMSTRONG was aware that settlement talks
17 involving all the ORG-related cases in which Flynn was either
18 counsel or party were occurring in Los Angeles, California between
19 Flynn and the ORG. Such talks had occurred a number of times over
20 the prior four years. On December 5, 1986 ARMSTRONG was flown to
21 Los Angeles, as were several other of Flynn's clients with claims
22 against the organization, to participate in a "global settlement."
23 Prior to flying to Los Angeles, ARMSTRONG had reached an agreement
24 with Flynn on a monetary figure to settle Armstrong I, but did not
25 know any of the other conditions of settlement.

26 16. After ARMSTRONG's arrival in Los Angeles, Flynn
27 showed him a copy of a document entitled "Mutual Release of All
28 Claims and Settlement Agreement," hereinafter "the settlement

1 agreement," and some other documents including affidavits, and was
2 advised by Flynn that he was expected to sign them all. Upon
3 reading the settlement agreement ARMSTRONG was shocked and
4 heartsick. ARMSTRONG told Flynn that the condition of "strict
5 confidentiality and silence with respect to his experiences with
6 the" ORG, since it involved over seventeen years of his life was
7 impossible to perform. ARMSTRONG told Flynn that the liquidated
8 damages clause was outrageous; that pursuant to the agreement
9 ARMSTRONG would have to pay \$50,000.00 if he told a medical doctor
10 or psychologist about his experiences from those years, or if he
11 put on a job resume what positions he had held during his
12 organization years. He told Flynn that the requirements of non-
13 amenability to service of process and non-cooperation with persons
14 or organizations adverse to the ORG were obstructive of justice.
15 He told Flynn that agreeing to leave the ORG's appeal of the
16 Breckenridge decision and not respond to any subsequent appeals
17 was unfair to the courts and all the people who had been helped by
18 the decision. ARMSTRONG told Flynn that an affidavit the ORG was
19 demanding that he sign was false, that there had been no
20 management change, that his private preclear folders were still
21 being culled, and that he had the same disagreements with the
22 ORG's Fair Game policies and actions, which had continued without
23 change up to that date. ARMSTRONG told Flynn that he was being
24 asked to betray everything and everyone he had fought for against
25 organization injustice.

26 17. In answer to ARMSTRONG's objections to the
27 settlement agreement Flynn said that the silence and liquidated
28 damages clauses, and anything which called for obstruction of

1 justice were "not worth the paper they [were] printed on." Flynn
2 stated that representation a number of times and in a number of
3 ways; e.g., that ARMSTRONG could not contract away his
4 Constitutional rights; that the conditions were unenforceable.
5 Flynn stated that he had advised the ORG's lawyers that those
6 conditions in the settlement agreement were not worth the paper
7 they were printed on, but that the ORG, nevertheless, insisted on
8 their inclusion and would not agree to any changes. Flynn pointed
9 out to ARMSTRONG the clauses in the settlement agreement
10 concerning his release of his claims against the ORG and the ORG's
11 release of its claims against ARMSTRONG and stated that they were
12 the essential elements of the settlement and what the organization
13 was paying for.

14 18. Flynn stated to ARMSTRONG at that time that he was
15 sick of the litigation and the threats to him and his family, and
16 that he wanted to get out. Flynn stated that all the people
17 involved in his side of the ORG-related litigation were sick of it
18 and wanted to get on with their lives. He said that as a
19 condition of settlement he and his co-counsels in the ORG-related
20 litigation had agreed to not become involved in that litigation in
21 the future. Flynn conveyed to ARMSTRONG a hopelessness concerning
22 the inability of the courts of this country to deal with the ORG,
23 its lawyers and their contemptuous abuse of the justice system.
24 Flynn told ARMSTRONG that if he didn't sign the documents all he
25 had to look forward to was more years of harassment and misery.
26 When ARMSTRONG expressed his continuing objections to the
27 settlement agreement, Edward Walters, whom Flynn had kept present
28 in the room during this discussion with ARMSTRONG, and who was

1 another of Flynn's clients and a participant in the settling of
2 Flynn's ORG-related litigation, yelled at ARMSTRONG accusing him
3 of killing the settlement for everyone, that everyone else had
4 signed or would sign, and that everyone else wanted the
5 settlement. Flynn told ARMSTRONG that the ORG would only settle
6 with everyone together; otherwise there would be no settlement.
7 Flynn did agree to ask the ORG to include a clause in ARMSTRONG'S
8 settlement agreement allowing him to keep his creative works
9 relating to L. Ron Hubbard or the organization.

10 19. Flynn stated to ARMSTRONG that a major reason for
11 the settlement's "global" form was to give the ORG the opportunity
12 to change its combative attitude and behavior by removing the
13 threat he and his clients represented to it. He said that the ORG
14 wanted peace and unless ARMSTRONG signed the ORG's documents there
15 would be no peace. Flynn stated that the ORG's attorneys had
16 promised that the affidavit ARMSTRONG considered false would only
17 be used by the ORG if ARMSTRONG began attacking it after the
18 settlement. Since ARMSTRONG had no intention of attacking the
19 ORG, understood that the offensive affidavit would never see the
20 light of day.

21 20. During ARMSTRONG'S meeting with Flynn he found
22 himself facing a dilemma. If he refused to sign the settlement
23 agreement and affidavit all the other settling litigants, many of
24 whom had already been flown to Los Angeles in anticipation of a
25 settlement, would be disappointed and would continue to be
26 subjected to organization harassment for an unknown period of
27 time. ARMSTRONG had been positioned as a deal-breaker and led to
28 believe he would lose the support of some, if not all, of the

1 settling claimants, several of whom were key witnesses in his case
2 against the ORG. ARMSTRONG was led to believe that all the
3 lawyers involved in his case desperately wanted out of the ORG-
4 related litigation, and should he not sign the settlement
5 documents would become unhappy and unwilling in their
6 representation of him. ARMSTRONG reasoned that, on the other
7 hand, if he did sign the settlement documents all his co-
8 litigants, some of whom he knew to be in financial trouble, would
9 be happy, the stress they felt would be reduced and they could get
10 on with their lives. ARMSTRONG believed that Flynn and his other
11 lawyers would be happy and the threat to them and their families
12 removed. ARMSTRONG believed that the ORG would have the
13 opportunity its lawyers said it desired to clean up its act, and
14 start anew. Armed with Flynn's assurance that the conditions he
15 found so offensive in the settlement agreement were not worth the
16 paper they were printed on, and the knowledge that the ORG's
17 attorneys were also aware of that fact, ARMSTRONG put on a happy
18 face and on the following day went through the charade of a
19 videotaped signing. A true and correct copy of the settlement
20 agreement is attached hereto as Exhibit A.

21 21. On December 11, 1986, pursuant to stipulation,
22 Judge Breckenridge issued orders dismissing the Armstrong I Cross-
23 Complaint, directing that the settlement agreement be filed and
24 retained by the clerk under seal, releasing to the ORG all trial
25 exhibits and other documents which had been held by the clerk of
26 the Court, and sealing the entire Court file. Despite the Court's
27 specific order the ORG never filed the Settlement Agreement.

28 22. On December 18, 1986 the California Court of

1 Appeal, Second Appellate District, Division Three, issued an
2 unpublished opinion dismissing the ORG's appeal from the
3 Breckenridge decision on the ground that there would be no
4 appealable final judgment until after trial of the Armstrong I
5 Cross-Complaint.

6 23. The ORG filed a Petition for Rehearing of its
7 appeal in the Court of Appeal, which was denied January 15, 1987;
8 then a Petition for Review by the California Supreme Court which
9 was denied March 11, 1987. On January 30, 1987 the ORG filed in
10 the Los Angeles Superior Court an "Unopposed Motion to Withdraw
11 Memorandum of Intended Decision," which Judge Breckenridge denied
12 February 2, 1987. On February 9, 1987 the ORG filed a Notice of
13 Appeal from the orders issued pursuant to stipulation by Judge
14 Breckenridge on December 11, 1986.

15 24. The ORG, and all Cross-Defendants herein, did not
16 desire peace from the December 1986 settlement with ARMSTRONG but
17 an advantage wherein they could continue to attack him without his
18 being able to respond. They removed his lawyers from defending
19 him, and used his lead lawyer, Flynn, as their agent to relay to
20 ARMSTRONG threats of litigation and to keep him from responding to
21 their attacks. Immediately following the settlement ORG
22 operatives contacted Beverly Rutherford, one of ARMSTRONG's
23 friends from his pre-Scientology past, to try to get information
24 from her concerning ARMSTRONG of a personal and embarrassing
25 nature to be used against him. Also immediately following the
26 settlement the ORG delivered a pack of documents concerning and
27 attacking ARMSTRONG to reporters Robert Welkos and Joel Sappell of
28 the Los Angeles Times. The ORG has continued from the date of the

1 settlement to collect intelligence information on ARMSTRONG, to
2 consider him an enemy and to treat him as Fair Game. The
3 settlement itself in intention, form, and effect was an act of
4 Fair Game.

5 25. Although contacted a number of times by the media
6 for statements concerning the ORG or Hubbard in the three years
7 following the settlement, ARMSTRONG did not make any public
8 statements during that period.

9 26. In the fall of 1987 ARMSTRONG received a document,
10 which had been created and circulated by the ORG to discredit
11 ARMSTRONG and writer Bent Corydon. In this document the ORG
12 accused ARMSTRONG of "numerous false claims and lies," of
13 "incompetence as a researcher," as having "stolen valuable
14 documents from [ORG] archives," and of being part of "a small
15 cabal of thieves, perjurers and disreputable sources." Such
16 statements were themselves lies, known to the ORG to be lies,
17 malicious, and intended to destroy ARMSTRONG's reputation and
18 credibility. In this document as well the ORG describes
19 ARMSTRONG's experiences in the organization as Hubbard's archivist
20 and biographical researcher, and discusses aspects of the
21 Armstrong I litigation, all in violation of the letter and spirit
22 of the settlement.

23 27. In early 1988 ARMSTRONG received a number of
24 affidavits the ORG had filed in Miller, which accuse ARMSTRONG of,
25 inter alia, retaining documents in violation of a Los Angeles
26 Superior Court order, providing documents to Russell Miller in
27 violation of a court order, and violating court sealing orders.
28 The affidavits accuse ARMSTRONG of being "an admitted agent

1 provocateur of the U.S. Federal Government who planned to plant
2 forged documents in [ORG] files which would then be "found" by
3 Federal officials in subsequent investigations as evidence of
4 criminal activity," and of intending to "plant forged documents
5 within the [ORG] and then using the contents to get the [ORG]
6 raided. All of the ORG's accusations regarding ARMSTRONG in the
7 affidavits filed in Miller are false, known by the ORG to be
8 false, malicious and intended to destroy ARMSTRONG's credibility.
9 ARMSTRONG has proven repeatedly to the ORG that its accusations
10 are false, but the ORG has not corrected the falsehoods wherever
11 they have been uttered or written but has continued to spread its
12 lies about ARMSTRONG.

13 28. The ORG's affidavits filed in Miller also contain
14 descriptions of ARMSTRONG's experiences in the organization and
15 conditions of the settlement agreement. At the same time the ORG
16 demanded that ARMSTRONG not discuss his own experiences or
17 conditions of settlement on penalty of \$50,000.00 an utterance.
18 The ORG itself filed documents in the case straight out of the
19 sealed Armstrong I file. Such acts are intended to bring about
20 ARMSTRONG's mental disintegration and total destruction, are
21 conscious and premeditated acts by the ORG of Fair Game, and have
22 caused ARMSTRONG great anguish.

23 29. Also in October 1987 ARMSTRONG was contacted by a
24 reporter from the London Sunday Times who advised him that ORG
25 representatives had given the newspaper a pack of documents
26 concerning him. The reporter said that the ORG representatives
27 were claiming that ARMSTRONG was an agent provocateur who tried to
28 plant forged documents in the organization and wanted to destroy

1 the scientology religion. The reporter also said that the ORG
2 representatives had given the newspaper a videotape of ARMSTRONG
3 they claimed showed him conspiring to overthrow ORG management.
4 ARMSTRONG told the reporter that although he considered the ORG's
5 attacks violated the settlement agreement he would not respond to
6 them.

7 30. On December 21, 1988 ARMSTRONG received a call from
8 Flynn who relayed a message from Michael Lee Hertzberg, one of the
9 organization's leading lawyers stating that he wanted ARMSTRONG to
10 file a pleading to keep the court file sealed in the face of
11 efforts by the plaintiff in Corydon v. CSI, Los Angeles Superior
12 Court case no. C 694401, who had filed a motion to unseal the
13 Armstrong I court file. Flynn stated that Hertzberg had
14 threatened that if ARMSTRONG failed to cooperate Hertzberg would
15 release a private and personal document belonging to ARMSTRONG
16 regarding one of his dreams specifically sealed by Judge
17 Breckenridge in Armstrong I.

18 31. On December 27, 1988 ARMSTRONG spoke again by phone
19 with Flynn, who advised ARMSTRONG that due to a court order
20 unsealing the file in Armstrong I, he was going to file a pleading
21 to say that the settlement documents should remain sealed.
22 ARMSTRONG disagreed and advised Flynn he did not want such a paper
23 filed, but on November 15, 1989 ARMSTRONG received notice that
24 Flynn had filed such a paper against his wishes.

25 32. On October 11, 1989 ARMSTRONG was served with a
26 deposition subpoena duces tecum which had been issued by Toby
27 Plevin, an attorney representing Corydon in his litigation against
28 the ORG.

1 33. On October 23, 1989 ARMSTRONG received a call from
2 Heller who stated that the ORG would seek a protective order to
3 prevent Armstrong's deposition in Corydon from going forward, that
4 Armstrong should be represented by an ORG lawyer, that to maintain
5 the settlement agreement ARMSTRONG could only answer questions by
6 court order, that ARMSTRONG should refuse to answer the deposition
7 questions and force Corydon to get an order from the court
8 compelling ARMSTRONG to answer.

9 34. On October 25, 1989 Heller told ARMSTRONG that he
10 had a problem with ARMSTRONG responding to deposition questions
11 concerning such things as L. Ron Hubbard's misrepresentations or
12 ARMSTRONG's period as Hubbard's archivist in the organization,
13 that he wanted to have an attorney present to instruct ARMSTRONG
14 not to answer such questions so that Corydon would have to move to
15 compel an answer, and that if the court ordered sanctions for
16 ARMSTRONG's refusal to answer, the ORG would indemnify him.
17 Heller further stated that ARMSTRONG had a contractual obligation
18 to the ORG, and that if ARMSTRONG did answer deposition questions
19 he would have breached the settlement agreement and may be sued.

20 35. Based on Heller's threats, the earlier threats and
21 ORG post-settlement attacks described above, ARMSTRONG's
22 understanding of his importance to and involvement with the ORG,
23 and his knowledge of the ORG, its fraud and Fair Game, moved him
24 at that time to protect himself by beginning to assemble
25 documentation and prepare a declaration to oppose these ORG
26 abuses.

27 36. On November 1, 1989 Heller, on behalf of ORG entity
28 ASI, a defendant in Corydon, filed a motion "to Delay or Prevent

1 the Taking of Certain Third Party Depositions," relating to the
2 deposition of ARMSTRONG. Heller stated in the motion:

3 "One of the key ingredients to completing these
4 settlement, insisted upon by all parties involved, was
5 strict confidentiality respecting: (1) the Scientology
6 parishioner or staff member's experiences within the
7 Church of Scientology; (2) any knowledge possessed by
8 the Scientology entities concerning those staff members
9 or parishioners; and (3) the terms and conditions of the
10 settlements themselves."

11 37. On November 18, 1989 ARMSTRONG received a copy of a
12 videotape edited from videotapes of him made in 1984 by ORG
13 intelligence operatives and used thereafter against him. This copy
14 had been given to the London Sunday Times, along with a package of
15 documents concerning ARMSTRONG by ORG operatives. Taped to the
16 video cassette was the business card of Eugene M. Ingram, the
17 ORG's private detective who had set up the videotaping.

18 38. On November 20, 1989 Heller contacted ARMSTRONG and
19 advised him that he wanted ARMSTRONG to execute ORG a declaration
20 that ARMSTRONG had either no or minimal contact with Corydon in
21 the organization, and that subsequent to leaving he had received
22 no information about Corydon. ARMSTRONG told Heller that he knew
23 Corydon quite well and that he saw himself as a relevant witness,
24 and would go forward with the deposition. Heller said to do so
25 would be a mistake because only the ORG would ever help him, that
26 ARMSTRONG should assist the ORG because it had honored its
27 agreement, that the ORG had signed a non-disclosure agreement as
28 well and as far as he knew had lived up to its agreement. When

1 ARMSTRONG disagreed, Heller reiterated at the end of the
2 conversation that if ARMSTRONG started to testify, for example
3 about the Hubbard biography project, or things he and the ORG
4 considered irrelevant, he would be sued for breach of contract.

5 39. On November 30, 1989 ARMSTRONG attended a hearing
6 in Corydon of the ORG's motion to prevent his deposition from
7 going forward where he was served with a subpoena duces tecum
8 ordering him to appear as a witness in the trial of Religious
9 Technology Center v. Joseph A. Yanny, Los Angeles Superior Court
10 Case no. C 690211.

11 40. On February 15, 1990 ARMSTRONG received a call
12 from one of Michael Flynn' partners, attorney Michael A. Tabb, who
13 said he had been called by Heller who told him that the ORG
14 considered ARMSTRONG had violated the settlement agreement by
15 being in the courthouse when he was served in Yanny, that they
16 intended to prove it, and that he would be sued.

17 41. On January 18, 1990 ARMSTRONG received a copy of
18 Appellants' Opening Brief which the ORG had filed December 21,
19 1989 in appeal No. B025920 in Division Three of the Second
20 Appellate District in the California Court of Appeal wherein the
21 ORG sought a reversal of the 1984 Breckenridge decision. On
22 January 30, 1990 ARMSTRONG received the Reply Brief of Appellants
23 and Response to Cross-Appeal filed in Division Four in the Second
24 Appellate District in an appeal entitled Church of Scientology of
25 California and Mary Sue Hubbard, Appellants, against Gerald
26 Armstrong, Defendant; Bent Corydon, Appellee, No. B038975 in which
27 the ORG sought a reversal of Judge Geernaert's ruling unsealing
28 the Armstrong I court file.

1 42. Because the settlement agreement prohibited
2 ARMSTRONG from opposing any of the appeals the ORG might take, he
3 filed a Petition for Permission to Respond in the B025920 Division
4 Three appeal February 28, 1990, and in the B038975 Division Four
5 appeal March 1, 1990. When his petitions were granted, ARMSTRONG
6 filed a Respondent's Briefs opposing the ORG appeals.

7 43. ARMSTRONG's March 15, 1990 declaration that he had
8 filed in the Court of Appeal was used by Corydon as an exhibit
9 supporting a motion for an order directing non-interference with
10 witnesses. In its opposition thereto the ORG Heller contradicted
11 what he earlier had said to ARMSTRONG about the agreement being
12 reciprocal, now stating that the ORG was free to talk about
13 Armstrong, but that Armstrong was not free to talk about it.
14 Heller's lies to ARMSTRONG, his lies in sworn declarations about
15 the reciprocity of the settlement agreement, the trap ARMSTRONG
16 had been placed in by the ORG and his own attorney, who, because
17 of ORG Fair Game tactics, had deserted him, caused ARMSTRONG great
18 distress and grief.

19 44. In his March 27 1990, declaration and in the
20 opposition to plaintiff's motion for non-interference with
21 witnesses in Corydon, Heller denied that the three telephone calls
22 with ARMSTRONG occurred, denied offering to have the ORG pay for
23 an attorney at ARMSTRONG's deposition in Corydon, denied offering
24 to indemnify ARMSTRONG for sanctions which might be imposed by the
25 court, and denied threatening ARMSTRONG with litigation. These
26 denials are lies.

27 45. In his March 26, 1990 declaration, Kenneth Long,
28 the ORG staff member who had executed a number of the affidavits

1 concerning ARMSTRONG which were filed in the Miller case, stated:

2 "In January, 1987, following settlement of Scientology
3 (sic) of California ("CSC"), Armstrong turned over to
4 CSC all [ORG]-related documents in his possession. I
5 personally inspected the documents turned over by
6 Armstrong, and found a number of copies of the documents
7 which Armstrong had previously sworn that he had
8 surrendered to the Clerk of the Court. [] Based on my
9 discovery of these documents, I concluded that Armstrong
10 had intentionally perjured himself on numerous
11 occasions, and had as well knowingly violated orders
12 issued by judges at all levels ranging from the Los
13 Angeles Superior Court to the Supreme Court of the
14 United States."

15 Long's statement is false, reckless and malicious. Long stated as
16 well that his affidavits attacking ARMSTRONG in Miller were
17 necessary "to detail the elements of the breach of confidence
18 against Miller and Penguin, and the claim could not have been
19 brought without explaining the underlying actions taken by
20 Armstrong."

21 46. On March 21, 1990 ARMSTRONG spoke by phone with
22 Michael Flynn, who said that he had been called by Lawrence Heller
23 two or three weeks before. Flynn said that Heller told him that
24 ARMSTRONG was right then sitting in the courtroom at the Yanny
25 trial and he asked Flynn to call ARMSTRONG and tell him that if he
26 testified in Yanny he would be in violation of the settlement
27 agreement and would be sued. ARMSTRONG had been present at the
28 Yanny trial March 5, 1990.

1 47. In early April, 1990 ARMSTRONG received a call from
2 ORG lawyer Eric Lieberman who threatened dire consequences if
3 ARMSTRONG continued to speak out against the ORG in violation of
4 the settlement agreement. ARMSTRONG related to Lieberman a list
5 of the ORG's post-settlement attacks on ARMSTRONG in violation
6 itself of the agreement. Lieberman dismissed ARMSTRONG's
7 grievances as insignificant.

8 48. On July 8, 1988 the Internal Revenue Service issued
9 a document entitled "final adverse ruling" to Cross-Defendant
10 herein COST denying its application for tax exempt status. In that
11 ruling the IRS stated:

12 "In support of the protest (protest conference was held
13 in January 1987) to our initial adverse ruling, we were
14 supplied with copies of affidavits dated December 4,
15 1986, from Gerald Armstrong and Laurel Sullivan. Ms.
16 Sullivan was the person in charge of the MCCS project
17 (the ORG's "Mission Corporate Category Sort-out," the
18 purpose of which was to devise a new organizational
19 structure to conceal L. Ron Hubbard's continued
20 control). The affidavits state that the new church
21 management 'seems to have returned to the basic and
22 lawful policies and procedures as laid out by the
23 founder of the religion, L. Ron Hubbard.' The
24 affidavits conclude as follows: 'Because of the
25 foregoing, I no longer have any conflict with the Church
26 of Scientology or individual members affiliated with the
27 Church. Accordingly I have executed a mutual release
28 agreement with the Church of Scientology and sign this

1 affidavit in order to signify that I have no quarrel
2 with the Church of Scientology or any of its members.'"
3 The ORG filed the ARMSTRONG affidavit in the COST case for the
4 purpose of destroying his credibility and in violation of the
5 representation the ORG had Flynn make to ARMSTRONG during
6 settlement that such affidavit would never be used unless
7 ARMSTRONG attacked the ORG after settlement. The ORG's filing of
8 the affidavit, its use of the courts, and the campaign to destroy
9 ARMSTRONG's reputation have caused ARMSTRONG great emotional
10 distress.

11 49. In August 1991 while in South Africa ARMSTRONG was
12 informed by Stuart Cutler, a lawyer for Malcolm Nothling,
13 litigant against the ORG, that the ORG had provided ARMSTRONG's
14 personal papers regarding the 1985 dream which had been sealed in
15 Armstrong I, to the ORG's South African legal representatives for
16 use against ARMSTRONG in the Nothling litigation in which
17 ARMSTRONG was expected to testify. The dissemination of this
18 document in South Africa caused ARMSTRONG great embarrassment and
19 emotional distress.

20 50. On August 12, 1991 the ORG filed a lawsuit against
21 17 agents of the IRS, case no. 91-4301-SVW in United States
22 District Court, Central District of California for more than
23 \$120,000,000.00. The ORG used therein a false rendition of the
24 1984 illegal videotaping of ARMSTRONG, which videotape had been
25 sealed in the Armstrong I court file. The ORG stated in its
26 complaint:

27 "The infiltration of the [ORG] was planned by the LA CID
28 along with former [ORG] member Gerald Armstrong, who

1 planned to seed [ORG] files with forged documents which
2 the IRS could then seize in a raid. The CID actually
3 planned to assist Armstrong in taking over the [ORG]
4 hierarchy which would then turn over all [ORG] documents
5 to the IRS for their investigation."

6 The ORG knew that these accusations were false, knew that
7 ARMSTRONG knew they were false.

8 51. Upon his return to the United States from South
9 Africa, Armstrong visited the law office of Ford Greene who asked
10 for his help. Armstrong, who is a trained paralegal, and lived in
11 the same Marin County town as Greene, agreed to help him, and has
12 been working with him from that time until the present. The moment
13 he began working in Greene's office the ORG began to terrorize him
14 with constant surveillance by ORG intelligence operatives,
15 videotaped him, embarrassed him, caused disturbances in the
16 neighborhood of Greene's law firm, and caused him great fear. The
17 ORG has a reputation of using its intelligence operatives or
18 private investigators to assault its perceived enemies, frame
19 them, entrap them, terrorize them, lie about them, and steal from
20 them. Judge Breckenridge in Armstrong I, had found that:

21 "Defendant Armstrong was the subject of harassment,
22 including being followed and surveilled by individuals
23 who admitted employment by [the ORG]; being assaulted by
24 one of these individuals; being struck bodily by a car
25 driven by one of these individuals; having two attempts
26 made by said individuals apparently to involve Defendant
27 Armstrong in a freeway automobile accident; having said
28 individuals come onto Defendant Armstrong's property,

1 spy in his windows, create disturbances, and upset his
2 neighbors."

3 The August 1991 surveillance of ARMSTRONG by ORG operatives
4 was intended to and caused ARMSTRONG severe shock and emotional
5 distress.

6 52. ARMSTRONG called and wrote to ORG lawyer Eric
7 Lieberman on August 21 and 22, 1991 protesting the surveillance,
8 videotaping and ORG terror tactics. Lieberman never responded,
9 but the ORG responded with renewed attacks on ARMSTRONG, filing
10 perjurious declarations about him in the Aznaran case accusing him
11 of, inter alia, being in Greene's office (during the period when
12 he had been in South Africa), of being employed by Joseph Yanny
13 while working for Greene, and of being Yanny's extension in the
14 Aznaran case. The ORG used these lies in a series of attempts to
15 have the Aznaran case dismissed, and in further attempts to
16 destroy ARMSTRONG's credibility and his capacity to defend himself
17 from the ORG's attacks. The ORG also filed perjurious
18 declarations in Aznaran concerning the illegal 1984 Armstrong
19 operation, claiming, inter alia, that the operation was a police-
20 sanctioned investigation, that ARMSTRONG was plotting against the
21 ORG and seeking out staff members who would be willing to assist
22 him in overthrowing its leadership, and that ARMSTRONG's theory of
23 litigation against the ORG was to fabricate the facts. These lies
24 were used in a series of attempts to deny the Aznarans justice and
25 to attack ARMSTRONG's credibility and leave him defenseless before
26 the ORG's assault. The ORG moreover used in these attempts
27 transcripts of the illegal 1984 videotaping of ARMSTRONG which had
28 been sealed in the Armstrong I court file. The ORG knew its lies

1 filed in the Aznaran case regarding ARMSTRONG were lies, knew it
2 was using sealed documents to attack ARMSTRONG, knew that such
3 caused ARMSTRONG great emotional distress, and knew that its acts
4 in Armstrong I had caused him emotional distress for which it had
5 paid ARMSTRONG a significant sum of money. The ORG's statements
6 filed in Aznaran regarding ARMSTRONG were malicious and an abuse
7 process. ARMSTRONG filed a declaration in Aznaran dated September
8 3, 1991 detailing the lies the ORG had up to that time filed about
9 him in that case and stating the truth of the matters. On June
10 23, 1992, Judge Ideman, presiding in the Aznaran case denied all
11 the ORG's motions in which it had filed its attacks on ARMSTRONG.

12 53. On October 3, 1991 the ORG, using CSC, CSI and RTC
13 as Plaintiffs, filed a motion in Los Angeles Superior Court in the
14 Armstrong I case to enforce the settlement agreement in which it
15 charged that ARMSTRONG's declaration in Aznaran which rebutted the
16 ORG's lies filed about him in that case was a violation of the
17 settlement agreement. That motion, in which the ORG sought from
18 ARMSTRONG \$100,000.00 in damages for his responses to ORG attacks,
19 was denied on December 23, 1991 by Judge Geernaert, who stated
20 during the hearing of that date:

21 " So my belief is Judge Breckenridge, being a very
22 careful judge, follows about the same practice and if he
23 had been presented that whole agreement and if he had
24 been asked to order its performance, he would have dug
25 his feet in because that is one of the [] most
26 ambiguous, one-sided agreements I have ever read. And I
27 would not have ordered the enforcement of hardly any of
28 the terms had I been asked to, even on the threat that,

1 okay the case is not settled.

2 I know we like to settle cases. But we don't want to
3 settle cases and, in effect, prostrate the court system
4 into making an order which is not fair or in the public
5 interest."

6 54. Heedless of Judge Geernaert's comments the ORG on
7 February 4, 1992 filed the underlying lawsuit, hereinafter
8 Armstrong II, this time seeking \$1,700,000.00 in damages. On
9 March 26, 1992 the ORG sought to have ARMSTRONG held in contempt
10 of court for communicating to the media about the litigation after
11 the ORG had itself given an interview to the media and in response
12 to the ORG's public comments about him. Judge Dufficy of the
13 Marin Superior Court, then presiding over the Armstrong II
14 litigation, refused to hear the ORG's effort to have ARMSTRONG
15 found in contempt. The effort, however, demonstrates the ORG's
16 intention: create a scenario in which ARMSTRONG responds to ORG
17 attacks and then have him jailed for his response. Then, pursuant
18 to ORG policy, neutralize him.

19 55. On February 19, 1992 Ford Greene, ARMSTRONG's
20 attorney in Armstrong II, wrote ORG attorney Laurie Bartilson
21 requesting that ARMSTRONG's former attorneys in Armstrong I,
22 Michael Flynn, Julia Dragojevic and Bruce Bunch, each of whom were
23 specifically prohibited by contract with the ORG from giving
24 ARMSTRONG a declaration to assist him in his defense of the ORG's
25 lawsuit to enforce the settlement agreement, be released from that
26 prohibition so they could provide him with needed declarations.
27 The ORG refused. On February 24, 1992 Greene wrote Bartilson
28 requesting that the other individuals who had entered into

1 settlement agreements with the ORG, negotiated by the ORG with
2 Flynn in 1986, and who were specifically prohibited from providing
3 ARMSTRONG with a declaration to assist him in his defense of the
4 ORG's lawsuit to enforce the settlement agreement, be released
5 from that prohibition so they could provide him with needed
6 declarations. Even though the ORG had used the fact of the other
7 individuals' settlement agreements being substantially similar to
8 the ARMSTRONG agreement, and cited to and relied on cases
9 involving those individuals' settlements in its lawsuit against
10 ARMSTRONG, the ORG refused to release them from their contract not
11 to assist ARMSTRONG.

12 56. On May 27, 1992 at a hearing on a motion the ORG
13 brought to obtain a preliminary injunction in this case, Los
14 Angeles Superior Court Judge Sohigian stated:

15 "The information that's being suppressed in this case,
16 however, is information about extremely blameworthy
17 behavior of the [ORG] which nobody owns; it is
18 information having to do with the behavior of a high
19 degree of offensiveness and behavior which is tortious
20 in the extreme. It involved abusing people who are weak.
21 It involves taking advantage of people who for one
22 reason or another get themselves enmeshed in this
23 extremist view in a way that makes them unable to resist
24 it apparently. There appears to be in the history of
25 [the ORG's] behavior a very, very substantial deviation
26 between [the ORG's] conduct and standards of ordinary,
27 courteous conduct and standards of ordinary honest
28 behavior. They're just way off in a different

1 firmament. [The ORG's] is the kind of behavior which
2 makes you sort of be sure you cut the deck and be sure
3 you've counted all the cards. If you're having a
4 friendly poker game you'd make sure to count all the
5 chips before you dealt any cards."

6 Despite these statements concerning the ORG and its practices, and
7 despite the ORG's knowledge of similar rulings and judgments in
8 Armstrong I, the case of Wollersheim v. Scientology, the case of
9 Allard v. Scientology, the case in England Re B & G Wards, the
10 cases of US v. Hubbard and US v. Kember, and of articles in the
11 Los Angeles Times in 1990 and Time magazine in 1991, the ORG
12 continues to attack ARMSTRONG and its other perceived enemies
13 pursuant to its basic doctrine of Fair Game. The ORG's refusal to
14 change its posture toward ARMSTRONG in the face of evidence of its
15 nature causes ARMSTRONG severe emotional distress. Judge Sohigian
16 denied the ORG's motion to enforce the settlement agreement in
17 every aspect except for his right to provide testimony in anti-ORG
18 litigation without being first subpoenaed to provide such
19 testimony. The Sohigian ruling left ARMSTRONG free to speak and
20 write freely about the ORG, to provide information to government
21 agencies without the need for a subpoena and to continue to work
22 as a paralegal.

23 57. ARMSTRONG has learned that MISCAVIGE possessed
24 ARMSTRONG's original artwork and manuscript after they were stolen
25 from ARMSTRONG's car in 1984. MISCAVIGE told Vicki Aznaran that
26 he had ARMSTRONG's artwork and manuscript, and he described
27 ARMSTRONG's works as weird poetry and letters to Hubbard. ORG
28 lawyer John Peterson in 1984, in response to ARMSTRONG's demand at

1 that time for return of his works denied that the ORG possessed
2 them. Now ARMSTRONG has the proof and he demands these works'
3 return.

4 58. The ORG has, for over a decade, waged a campaign of
5 hatred and psychological violence against ARMSTRONG. This
6 campaign has been observed and condemned by courts and the media.
7 In 1986 as an act of calculating Fair Game it used ARMSTRONG'S
8 lawyer, himself a long time target of Fair Game, to manipulate him
9 into a settlement of his claims against the ORG which was intended
10 to leave him lawyer-less and defenseless so that the ORG'S Fair
11 Game efforts against him could continue unopposed. In consummate
12 cynicism the ORG claims its purpose in the settlement was to make
13 peace. The ORG'S acts against ARMSTRONG have affected every
14 aspect of his life, taken from him the peace and seclusion he
15 sought and threatened his health, livelihood, friendships and his
16 very existence. These acts must stop.

17 FIRST CAUSE OF ACTION

18 (For Declaratory Relief Against All Defendants)

19 59. Cross-complainant ARMSTRONG realleges paragraphs 1
20 through 58, inclusive, and incorporates them by reference herein
21 as though fully set forth.

22 60. An actual controversy has arisen and now exists between
23 ARMSTRONG and CSI concerning their respective rights and duties in
24 that ARMSTRONG contends that the only provisions of the settlement
25 agreement that have any legal force any effect were those whereby
26 he dismissed his cross-complaint in Armstrong I in consideration
27 for a sum of money, and that paragraphs 4A, 4B, 7D, 7E, 7G, 7H,
28 7I, 10, 18D, 18E of the settlement agreement are void as against

1 public policy and should be severed therefrom, and that CSI and
2 its agents are not entitled to breach the settlement agreement
3 while requiring ARMSTRONG to adhere thereto, whereas CSI disputes
4 this contention and contends that it is entitled to enforce all
5 provisions of the settlement agreement against ARMSTRONG
6 notwithstanding the lack of mutuality thereof.

7 61. ARMSTRONG desires a judicial determination of his rights
8 and duties, and a declaration that the only provisions of the
9 settlement agreement which are valid are those which directly
10 pertain to the dismissal of his cross-complaint in Armstrong I in
11 consideration for the payment of a sum of money, and that
12 paragraphs 4A, 4B, 7D, 7E, 7G, 7H, 7I, 10, 18D, 18E of the
13 settlement agreement should be severed and held not to be legally
14 enforceable because they were designed to suppress evidence and
15 obstruct justice.

16 62. A judicial declaration is necessary and appropriate at
17 this time under the circumstances in order that ARMSTRONG may
18 ascertain his rights and duties under the settlement agreement.

19 63. ARMSTRONG is being harmed by the settlement agreement
20 insofar as his First Amendment Rights are curtailed, his ability
21 to freely pursue gainful employment is restricted, and his
22 reputation is being attacked in judicial proceedings which he is
23 unable to counter without risking violation of the settlement
24 agreement.

25 WHEREFORE, cross-complainant seeks relief as is hereinafter
26 pleaded.

27 SECOND CAUSE OF ACTION

28 (For Abuse Of Process Against All Defendants)

1 64. Cross-complainant ARMSTRONG realleges paragraphs 1
2 through 58, inclusive, and incorporates them by reference herein
3 as though fully set forth.

4 65. Defendants, and each of them, have abused the process of
5 this court in a wrongful manner, not proper in the regular conduct
6 of the proceedings in Armstrong I and in Armstrong II, and in
7 other litigation, to accomplish a purpose for which said
8 proceedings were not designed, specifically, the suppression of
9 evidence, the obstruction of justice, the assassination of cross-
10 complainant's reputation, and retaliation against said cross-
11 complainant for prevailing at trial in Armstrong I, all so as to
12 be able to attack cross-complainant and prevent cross-complainant
13 from being able to take any effective action to protect himself.

14 66. Defendants, and each of them, acted with an ulterior
15 motive to suppress evidence, obstruct justice, assassinate cross-
16 complainant's reputation, and to retaliate against cross-
17 complainant in said litigations.

18 67. That defendants, and each of them, have committed
19 willful acts of intimidation, threats, and submission of false and
20 confidential documents not authorized by the process of
21 litigation, and not proper in the regular conduct of litigation.

22 68. Cross-complainant has suffered damage, loss and harm,
23 including but not limited to his reputation, his emotional
24 tranquillity, and privacy.

25 69. That said damage, loss and harm was the proximate and
26 legal result of the use of such legal process.

27 **WHEREFORE**, cross-complainant seeks relief as is hereinafter
28 pleaded.

1 THIRD CAUSE OF ACTION

2 (Breach of Contract)

3 70. Cross-complainant ARMSTRONG realleges paragraphs 1
4 through 58, inclusive, and incorporates them by reference herein
5 as though fully set forth.

6 71. CSI, and/or its agents, and/or other Scientology-related
7 entities having engaged in on-going breaches of said settlement
8 agreement by making reference to ARMSTRONG (a) in communications
9 to the press, (b) in filing pleadings and declarations in various
10 litigations.

11 72. By reason of said breaches of the settlement agreement,
12 ARMSTRONG has been damaged in an amount not presently known but
13 believed to be in excess of the jurisdiction minimum of this
14 Court.

15 WHEREFORE, plaintiff prays for judgment as follows:

16 ON THE FIRST CAUSE OF ACTION

17 1. For a declaration paragraphs 4A, 4B, 7D, 7E, 7G, 7H, 7I,
18 10, 18D, 18E of the settlement agreement should be severed from
19 the settlement agreement and found to be of no legal force or
20 effect.

21 2. For damages according to proof.

22 3. For attorney's fees and costs of suit.

23 ON THE SECOND CAUSE OF ACTION

24 1. For general and compensatory damages according to proof.

25 2. For attorney's fees and costs of suit.

26 ON THE THIRD CAUSE OF ACTION

27 1. For compensatory and consequential damages according to
28 proof.

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2. For attorney's fees and costs of suit.

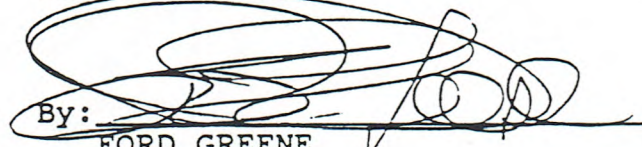
ON ALL CAUSES OF ACTION

1. For such other and further relief as the Court may deem just and proper.

Respectfully submitted,

DATED: October 7, 1992

HUB LAW OFFICES



By: _____
FORD GREENE
Attorney for Defendant

PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following documents: CROSS-COMPLAINT FOR DECLARATORY RELIEF, ABUSE OF PROCESS AND BREACH OF CONTRACT

on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Andrew Wilson, Esquire
WILSON, RYAN & CAMPILONGO
235 Montgomery Street, Suite 450
San Francisco, California 94104

LAURIE J. BARTILSON, ESQ.
Bowles & Moxon
6255 Sunset Boulevard
Suite 2000
Los Angeles, California 90028

PAUL MORANTZ, ESQ.
P.O. Box 511
Pacific Palisades, CA 90272

[x] (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

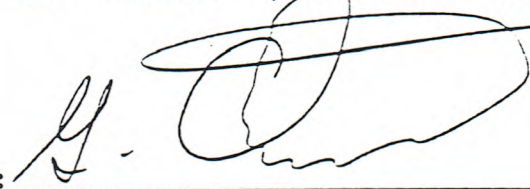
[x] (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: October 7, 1992

VERIFICATION

1
2 I, the undersigned, am an officer of defendant The Gerald
3 Armstrong Corporation in the above entitled action. I know the
4 contents of the foregoing Amended Cross-Complaint I certify that
5 the same is true of my own knowledge, except as to the matters
6 which are therein stated upon my information and belief, and as to
7 those matters, I believe them to be true.

8 I declare under penalty of perjury that the foregoing is true
9 and correct according to the laws of the State of California and
10 that this declaration was executed on the October 7, 1992 at San
11 Anselmo, California.

12
13 By: 
14 GERALD ARMSTRONG

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Date: August 16, 1994

Honorable DAVID A. HOROWITZ, Judge
2 C. AGUIRRE, Deputy Sheriff
, C.S.L.

S. ROBLES, Deputy Clerk
LINDA NISHIMOTO #9147, Reporter
, E/R Monitor

BC052395

(Parties and Counsel checked if present)

CHURCH OF SCIENTOLOGY, ETC

Counsel for
PlaintiffMICHAEL LEE HERTZBERG (x)
LAURIE J. BARTILSON (x)

VS

GERALD ARMSTRONG, ET AL

Counsel for
Defendant

FORD GREENE (x)

NO LEGAL FILE

NATURE OF PROCEEDINGS:

MOTION BY CROSS-DEFENDANT, CHURCH OF SCIENTOLOGY INTERNATIONAL, FOR SUMMARY ADJUDICATION OF THE SECOND AND THIRD CAUSES OF ACTION OF THE CROSS-COMPLAINT;

Motion for Summary Adjudication of a Cause of Action (SACA) GRANTED. No triable issues of material facts. The 2nd and 3rd Causes of Action have no merit. CCP 437c(f)(1).

3rd Cause of Action - Breach of Contract.

Undisputed Facts: #1-9, essentially Undisputed, Cross-Defendant has accurately described the provisions of the Agreement; #10, not sufficiently disputed, Undisputed; #11, Undisputed; #12, no sufficiently disputed, Undisputed; #13, Undisputed; #14, Undisputed; #15, not sufficiently disputed, Undisputed; #16, Undisputed.

The Agreement terms are clear and unambiguous. Cross-Complainant understood the terms and signed it. The duties and obligations of the Agreement are clearly stated. "Mutuality" and "reciprocal" duties cannot be read into the unambiguous terms of the Agreement.

There are no provisions in the Agreement prohibiting the Cross-Defendant from referring to Cross-Complainant with the press or in legal pleadings or declarations. Cross-Complainant's beliefs as to what the Agreement should have said, it's validity, or what his attorney said or did to him are not relevant. The Agreement itself acknowledges that no agreements or understandings have been made among the parties aside from those set forth in the Agreement.

2nd Cause of Action - Abuse of Process.

Undisputed Facts: #17, not sufficiently disputed, Undisputed; #18, not sufficiently disputed, Undisputed; #19, Disputed; #20, Disputed, not material; #21, not sufficiently disputed, Undisputed; #22, Undisputed; #23, Disputed as to time discovered by Church counsel; #24,

Page 1 of 3 Pages

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Date: August 16, 1994

Honorable DAVID A. HOROWITZ

, Judge
, Deputy Sheriff
, C.S.L.S. ROBLES
LINDA NISHIMOTO #9147, Deputy Clerk
, Reporter
, E/R Monitor

2a C. AGUIRRE

BC052395

(Parties and Counsel checked if present)

CHURCH OF SCIENTOLOGY, ETC

Counsel for
PlaintiffMICHAEL LEE HERTZBERG (x)
LAURIE J. BARTILSON (x)

VS

GERALD ARMSTRONG, ET AL

Counsel for
Defendant

FORD GREENE (x)

NO LEGAL FILE

NATURE OF PROCEEDINGS:

disputed as to motivation, otherwise Undisputed; #25, not sufficiently disputed, Undisputed; #26, Undisputed; #27, disputed as to word "further", otherwise Undisputed; #28, Disputed, but not material; #29, Undisputed; #30, Undisputed that Marin Court granted a motion to Transfer; #31, Undisputed, except for term "irreparably harmed; #32, Undisputed; #33, Undisputed; #34, not sufficiently disputed, Undisputed; #35, Undisputed.

A One Year Statute of Limitations applies to an Abuse of Process cause of action. Code of Civil Procedure Section 340. Conduct allegedly occurring prior to July 22, 1991 is precluded by the one year Statute. Conduct alleged in paragraphs 13-24, 26 and 27, 29 and 30, 33-38, 40, 43-48 and para 57 are alleged to have occurred before 7/22/91 and are time barred.

The alleged conduct constituting "abuse of process" contained in paragraphs 49, 51, 52 and 55 does not constitute such abuse of process. That is, there are no allegations concerning the abuse of court process which constitutes a cause of action.

Communications with "some relation" to judicial proceedings have been absolutely immune from tort liability by the privilege codified as section 47(b). Albertson v. Raboff.

The alleged conduct of bringing suit, contained in paragraphs 53 and 54, is not sufficient to state a cause of action for "abuse of process. The filing or maintaining of a lawsuit cannot support a claims for abuse of process. The filing of a suit to enforce the Settlement Agreement cannot support claims for abuse of process.

The conduct alleged in para 50, ie, the filing of a complaint and the use of a declaration speaking of Cross-Complainant, does not constitute abuse of process and is privileged.

Paragraph 52 alleged conduct relating to declarations filed in a case in which the Cross-Complainant is not a party. Such conduct does not constitute abuse of process and is privileged.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Date: August 16, 1994

Honorable DAVID A. HOROWITZ

, Judge
, Deputy Sheriff
, C.S.L.S. ROBLES
LINDA NISHIMOTO #9147, Deputy Clerk
, Reporter
, E/R Monitor

2b C. AGUIRRE

BC052395

(Parties and Counsel checked if present)

CHURCH OF SCIENTOLOGY, ETC

Counsel for
PlaintiffMICHAEL LEE HERTZBERG (x)
LAURIE J. BARTILSON (x)

VS

GERALD ARMSTRONG, ET AL

Counsel for
Defendant

FORD GREENE (x)

NO LEGAL FILE

NATURE OF PROCEEDINGS:

MOTION FOR SUMMARY ADJUDICATION OF SECOND AND THIRD CAUSES OF ACTION OF
THE CROSS-COMPLAINT OF GERALD ARMSTRONG, GRANTED.

David A. Horowitz

DAVID A. HOROWITZ, JUDGE

This is the order called for by Code of Civil Procedure Section 437c(f)
and Code of Civil Procedure Section 437c(g). No other written order is
required.A copy of this order is sent this date via U.S. Mail addressed as
follows:MICHAEL LEE HERTZBERG
ATTORNEY AT LAW
740 BROADWAY 5TH FL
NEW YORK NY 10003LAURIE J. BARTILSON
BOWLES & MOXON
6255 SUNSET BLVD STE 2000
HOLLYWOOD CA 90028FORD GREENE
HUB LAW OFFICES
711 SIR FRANCIS DRAKE BLVD
SAN ANSELMO CA 94960

MOXON & BARTILSON
ATTORNEYS AT LAW
6255 SUNSET BOULEVARD
SUITE 2000
HOLLYWOOD, CALIFORNIA 90028
TELEPHONE (213) 960-1936
TELECOPIER (213) 953-3351

KENDRICK L. MOXON #

LAURIE J. BARTILSON †

ALSO ADMITTED IN
THE DISTRICT OF COLUMBIA

† ALSO ADMITTED IN
MASSACHUSETTS

January 13, 1995

BY TELEFAX AND U.S. MAIL

Ford Greene, Esq.
Hub Law Offices
711 Sir Francis Drake Blvd.
San Anselmo, California 94960-1949

Re: Church of Scientology International v. Gerald Armstrong
MSC 157 680

Dear Ford:

I have received your document entitled "Gerald Armstrong's Amended Specially Prepared Interrogatories to Church of Scientology International," a document which, in violation of both Code and reason, contains 1,150 interrogatories, virtually none of which appear to concern matters that are actually relevant to matters which remain at issue in the above-entitled case.

Ford, these unprofessional, repetitive, and useless interrogatories don't do you or your client any good. They are an abuse of the discovery process on their face, intended solely to make extra work for plaintiff and its counsel and delay the inevitable trial in this matter.

Some months ago, you served a substantially similar set of interrogatories. After discussion, you agreed to withdraw those interrogatories, and attempt instead to propound discovery that was in accord with the Code of Civil Procedure. This latest effort is, if anything, even worse than that first attempt, and I, quite frankly, cannot believe that it represents the true efforts of an attorney familiar with the California Codes.

Please withdraw these interrogatories. If they are not withdrawn voluntarily, and I am forced to seek a protective order, I will ask the discovery referee to charge all costs of the motion, jointly and severally, to you and your client.

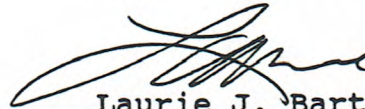
Please note the new letterhead, which also contains my new

Ford Greene
January 13, 1995
Page 2

telephone number. I will be filing a notice of substitution on behalf of my new firm shortly.

Sincerely,

MOXON & BARTILSON



Laurie J. Bartilson

LJB:aeu

cc: Andrew H. Wilson, Esq.
Michael Lee Hertzberg, Esq.
Paul Morantz, Esq.
Michael Walton, Esq.

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On February 14, 1995, I served the foregoing document described as DECLARATION OF LAURIE J. BARTILSON IN SUPPORT OF PLAINTIFF'S MOTION FOR PROTECTIVE ORDER AND SANCTIONS on interested parties in this action,

by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

by placing the original true copies thereof in sealed envelopes addressed as follows:

FORD GREENE
HUB Law Offices
711 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

Michael Walton
700 Larkspur Landing Circle
Suite 120
Larkspur, CA 94939

William R. Benz, Esq.
900 Larkspur Landing Circle, No. 185
Larkspur, CA 94939

BY MAIL

*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of

business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on February 14, 1995 at Los Angeles, California.

[] **** (BY PERSONAL SERVICE)** I delivered such envelopes by hand to the offices of the addressees.

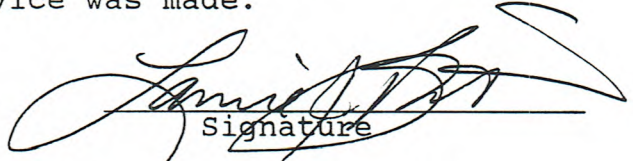
Executed on _____ at Los Angeles, California.

[X] (State) I declare under penalty of the laws of the State of California that the above is true and correct.

[] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Laurie Bartilson

Print or Type Name


Signature

* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

** (For personal service signature must be that of messenger)